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TRANSCRIPT OF RECORD

Supreme Court of the United States

OCTOBER TERM, 1947

No. 270

HARRISON PARKER, PETITIONER,

vs.

PEOPLE OF THE STATE OF ILLINOIS

ON WRIT OF CERTIORARI TO THE SUPREME COURT OF THE STATE OF ILLINOIS

PETITION FOR CERTIORARI FILED AUGUST 15, 1947.

CERTIORARI GRANTED JANUARY 5, 1948.

SUPREME COURT OF THE UNITED STATES

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[fol. 1]

IN THE SUPREME COURT OF ILLINOIS, MAY TERM, A. D. 1946

STATE OF ILLINOIS, Defendant-in-Error,

vs.

HARRISON PARKER, Plaintiff-in-Error

Error to the Appellate Court of Illinois, First District.

There heard on Writ of Error from the Circuit Court of Cook County.

Honorable Daniel P. Trude, Trial Judge.

ABSTRACT OF RECORDS—Filed August 20, 1946.

Placita.

Summons filed December 10, 1943.

Demand for Jury Trial filed December 8, 1943.

COMPLAINT—Filed December 8, 1943

"The plaintiff Harrison Parker, complaining of the defendant Jacob Shamberg, for cause of action, alleges as follows:

"1) That on December 11, 1942 at Chicago, . . . Jacob Shamberg maliciously spoke of and concerning the plaintiff the following malicious and defamatory words:

'You are a black mailer.'

"2) That said words were wholly false.

[fol. 2] "3) That the plaintiff was injured in his reputation, to the damage of the plaintiff in the sum of $10,000."

Appearance of Kirkland, Fleming, Green, Martin & Ellis, as Attorney- for Jacob Shamberg, filed December 28, 1943.

ANSWER OF JACOB SHAMBERG—Filed January 25, 1944

"1) The words complained of are true.

"2) And for a further defense, this defendant says that the words complained of were spoken on a privileged occasion, and the defendant in good faith believed them to be true."

PETITION FOR CHANGE OF VENUE AND ORDER

Petition of Harrison Parker, to the Circuit Court of Cook County, for a change of venue from Judges John Prystalski, William V. Brothers, Harry M. Fisher and Julius Miner, filed December 30, 1943.

Order of Judge John Prystalski, dated December 30, 1943, to allow the change of venue.

Order of the Executive Committee of the Circuit Court of Cook County, assigning the cause to Judge Cornelius J. Harrington, dated December 30, 1943.

PETITION FOR SUBPOENA AND ORDER

Petition of Jacob Shamberg, dated March 22, 1944, for an order permitting him to issue Subpoena Duces Tecum for the persons named in the petition, to appear for depositions, and to bring with them all the books and records which they have pertaining to the Puritan Church:

"That the Puritan Church is registered in the Recorder's Office of Cook County, under Document No. 13098859, at Page 223, in Book 1444, as a religious Corporation on June 28, 1943. The Certificate of Incorporation is signed by said [fol. 3] Parker, as Secretary of the Meeting."

"That the petitioner is informed and believes that Parker formed the so-called 'Puritan Church' as a means to carry on certain extortion operations and giving his activities an aura of legality . . ." that records and testimony of the named persons are material in this cause.

Duly sworn to by J. B. Martineau. Jurat omitted in printing.

Order of Judge Cornelius J. Harrington dated August 25, 1944, as follows:

"This cause coming on to be heard on the petition of the defendant, for an order requiring Dr. Agnes Richardson and Elmer L. Benton to answer certain interrogatories and the court being fully advised in the premises;

"It is hereby ordered that Dr. Agnes Richardson and Elmer L. Benton appear at room 3200, 33 North LaSalle Street, on October 2, 1944 at 10:00 A. M. and answer under

oath and not adversely the interrogatories heretofore propounded to said Agnes Richardson and Elmer L. Benton [fol. 4] together with all interrogatories leading from or out of said interrogatories.

Enter:

Cornelius J. Harrington, Judge."

O.K. H.P. Aug. 25, 1944.

Order of the Executive Committee of the Circuit Court of Cook County, transferring the cause to Judge Daniel P. Trude, dated October 4, 1944.

Withdrawal of Reuel Grunewald, as Attorney for Harrison Parker, dated December 4, 1944.

MOTION AND ORDER

Motion of Jacob Shamberg, filed January 2, 1945, for "an order directing the plaintiff Harrison Parker, to show cause why he should not produce for inspection and to be copied or photographed, the following specified documents relating to the merits of the matter in controversy:

"All originals, duplicate originals and copies of all letters, telegrams, writings, memoranda, etc., passing between and also all Minute Books, written resolutions, by-laws, trust deeds, contracts, books of account, invoices, receipted bills, canceled checks, check stubs, bank statements showing or reflecting any dealings between any of the following persons, firms, corporations and pretended religious corporations or bodies, during the period between January 1, 1940 up to and including the present time."

There follows 38 names of firms, persons, corporations and religious corporations, including the Ecumenical Council of the Puritan Church, the Brotherhood of the Ancient Order of St. John; the pretended Puritan Church Committee, to aid in driving the hoodlums, the assassins, and the black mailers out of the control of labor unions, out of [fol. 5] the control of the legal profession, out of the control of journalism and out of the control of politics; and the individuals Conrad Miner, Charles Norris, and the Chancellor.

Then the motion continued:

"Second: Defendant moves the court for the entry of an order requiring the plaintiff, Harrison Parker, to state by affidavit whether any of the documents hereinabove described in paragraph I are now or have at any time been in his possession or power, and if not now in his possession or power, when he parted with the same and what has become thereof."

Duly sworn to by J. B. Martineau. Jurat omitted in printing.

[fol. 6] Parker resisted that motion, then and there, as the excerpt from the motion of Shamberg, the defendant, recites:

"Mr. Parker: Your Honor, there is not a single request there that is pertinent to the issue. He wants the records of the Puritan Church. I told Your Honor they are in Canada.

"Mr. Martineau: We want that set up by affidavit under Rule 17. This man is very slippery.

"Mr. Parker: Your Honor, there is no power in the Court to ask for these things. They are records of the Church. I have nothing to do with them.

"Mr. Martineau: Your Honor, Mr. Parker has said many times that he can get these records here. I am prepared to show all this. I am proceeding under Section 17, sub-sections 8 and 9. If he wants to state what he has just said under oath in an affidavit, that is his privilege, but we do have a right to have him make that formal statement under oath. Rule 17, sub-sections 8 and 9.

* * *

"Mr. Parker: But the rule of the Supreme Court is about matters relative to the issue. They are not relative to the issue.

"The Court: They are relevant to the issue or may be.

"Mr. Parker: Your Honor, I suppose I have no objection to your entering the order if you want to do it.

"The Court: Now, fine, we are agreed upon one thing, at least.

"Mr. Martineau: How many days do you want, Mr. Parker, to answer?

[fol. 7] "Mr. Parker: What day is it you say we are coming back here for trial? What day is it?

"Mr. Martineau: I think His Honor said——

"The Court: I said Monday before this matter was discussed.

"Mr. Martineau: How many days do you want?

"Mr. Parker: Well——

"The Court: If they are to be in here Monday——

"Mr. Parker: They are not coming back, Your Honor. There is no worry about that. I can answer that thing. I should say, give me until Friday, and I will have a nice answer; one that the town will be glad to have on record."

Thereupon an order was entered on January 2, 1945, requiring Parker, within five days to show cause and to file the affidavit.

Order of Judge Daniel P. Trude, dated January 2, 1945 for Harrison Parker to state by Affidavit filed in this Court

"(1) whether any of the Documents described in said written Motion are now, or at any time in the past, have been, in his possession or power, and if not now in his possession or power, when he parted with same and what has become of them: (2) show cause why he should not produce for inspection, and to be copied or photographed the Documents described in said written Motion.

Daniel P. Trudge, Judge."

AFFIDAVIT

Affidavit of Harrison Parker, dated January 4, 1945, in which he states that he has not now, nor has he ever had in his possession, nor has he ever seen the described Documents passing between 22 of the individuals, firms or corporations named in the Motion: that in November 1944, when he moved his private files from 4534 Greenwood Ave-[fol. 8] nue, Chicago, he destroyed all his correspondence with Messrs. Miner, Race and Norris, along with a lot of other useless and unimportant to him letters, record-, etc., Answering questions 34, 35, 36 and 37, he attaches herewith as Exhibits A, B, C and D, all the described Documents

now in his possession, custody, control or power: all others were destroyed when he moved his office last November. Answering question 38, he stated that he never did, at any time, under any circumstances do business "under the name and style of the Puritan Church," "the Puritan Church Committee, etc., to Moderator." Answering question 23:

"The pretended Puritan Church Committee, to aid in driving the hoodlums, the assassins, and the black mailers out of the control of labor unions, out of the control of the legal profession, out of the control of journalism and out of the control of polities.

Conrad Miner, Charles Norris, Harrison Parker, Chairman."

He stated it had never been heard of by him, nor had he ever had any connection with such an organization. The above Affidavit was signed by Harrison Parker, and acknowledged by Leah Consolin, Notary Public, on the 4th day of January A. D. 1945.

The described Documents attached to his Affidavit are as follows:

EXHIBIT "A"

"Certified copy of Resolution passed at the joint meeting of the Ecumenical Council of the Puritan Church of the [fol. 9] United States, and the College of Divines of the Brotherhood of the Ancient Order of St. John, held at the Masonic Temple, 32 West Randolph Street, on August 16th, 1943, and amended at the adjourned meeting held in Chicago on February 5, 1944.

(Page 1)

"The direct Sires of the present members of this Puritan Church fled England to dwell as free men on American Soil;

"The direct Sires of the present members of this Church, fought at Concord and died at Valley Forge, to set up on American Soil, a government by law:

"That the government thus set up invited the peace loving to emigrate to it and share with the Puritans the

blessings that flow from living under such a government; that along with the peace loving came a lot of scoundrels:

"That along with the mixed crowd that came here, was Joseph Medill:

(Page 2)

"That as soon after as it was possible, Joseph Medill set up a corporately owned newspaper called the Chicago Tribune, whoses money making policy was

"1) to make circulation by being in its news and editorial columns 'agin' the government in power with libels of its leaders:

"2) to make cash dividends by blackmailing the public officials to allow it to steal money from the County which protected it in its infamy; that under his management, the Chicago Tribune cheated Cook County of 15 Million Dollars; that his daughters Katherine and Eleanor, succeeded [fol. 10] him; under their management the Chicago Tribune stole from Cook County an additional 20 Million Dollars; that the daughters named, were detected, tried and convicted by the United States Government, for withholding from the U. S. Government, an enormous sum of money; that the scheme the women used was devised in Weymouth Kirkland's law office; that these women were succeeded in the management of the Chicago Tribune by Robert R. McCormick, Joseph Medill Patterson and Mrs. Eleanor Schlesinger:

(Page 3)

"That the Court records of Illinois, show that Robert R. McCormick is a coward, a liar, a cheat, a thief, and an all around scoundrel, whose private fortune is an acknowledged 16 Million Dollars.

"That Joseph Medill Patterson kicked out of his life in her old age, the wife of his youth, and the mother of his legitimate children.

"That under the management of Robert R. McCormick and Joseph Medill Patterson, the Chicago Tribune has stolen from Cook County, more money than was stolen by it during its administration by their grandfather and mothers:

"That Robert R. McCormick influenced a U. S. Judge in case 22619, to issue an order under which Robert R. Mc-

Cormick entered his best friend's home and broke it up by stealing the friend's wife.

"That the public records show that Robert R. McCormick either influenced, intimidated or bribed Judges ..... and ....., in case 38-C-3209, to issue crooked orders to hide the fact that the Chicago Tribune had stolen 100 Million Dollars from Cook County.

[fol. 11] (Page 4)

"That said Robert R. McCormick either influenced, intimidated or bribed Justices ....., ... and ..... to write a crooked opinion in case 24881, which was filed to compel the Chicago Tribune to disgorge the 100 Million Dollars it has stolen from Cook County.

"That Robert R. McCormick either influenced, intimidated or bribed the entire division of the Appellate Court presided over by Judge ....., to write a crooked opinion in case 39804, in which McCormick and Kirkland had a money interest in a crooked opinion.

"That the unconscionable scoundrel Robert R. McCormick, either influenced, intimidated or bribed Judges ..... and ..... of the Criminal Court of Cook County, in cases 20981 and A40, to 'railroad' to Joliet Prison and to the Cook County Jail, men whom the Supreme Court records in cases 20981 and 25595 show to be innocent of the charges for which they were 'railroaded.'

(Page 5)

"That by reason of the corruption of said McCormick and his crooked lawyers of all the Courts of Illinois, from .....'s Municipal up to and including .....'s crooked Supreme Court, the combined money fortunes of the Medill-McCormick Patterson family now amount to the dangerous figure of 125 Million Dollars.

"That this swollen money fortune has passed to the third generation without the payment of a single cent, of the legally imposed taxes, except a small one paid on the estate of Eleanor Medill Patterson.

[fol. 12] "That Katherine Medill McCormick was born in Chicago, lived in Chicago, and is buried in Chicago.

"That before her last trip abroad, Weymouth Kirkland drew a will for the lady, in which she stated over her own signature, that she was a resident of the City of Chicago;

she informed the Collector of Internal Revenue that her official address was in Chicago. She died while sojourning in Paris, France. When her will was offered for probate in Chicago, Robert R. McCormick quietly without any publicity appeared before Harry B. Ash, a politician, supported for office by the Chicago Tribune; and there took the witness stand, and there made an oath to his God to tell the truth: then he lied like a horse

(Page 6)

thief, by stating that his mother Katherine Medill McCormick was not a resident of Illinois.

"That Weymouth Kirkland followed Robert McCormick on the witness stand; he took *took* an oath to his God, to tell the truth: then, with a straight face, he too swore that Katherine Medill McCormick was not a resident of Illinois: thus Kirkland repudiated a mandate in a will, for which a client had paid him a fee, to insert.

"Upon the self-serving testimony of these two pink-scented scoundrels, Harry B. Ash decided that Katherine Medill McCormick was not a resident of Illinois.

"By that one man decision, the State of Illinois was robbed of an enormous sum of money due to it, and Robert R. McCormick and his crooked lawyer Weymouth Kirkland were correspondingly enriched.

[fol. 13] (Page 7)

"That by an act of God there has been revealed evidence that, while the Chicago Tribune was hypocritically shouting it was a free press, watching the interests of the public, it was robbing Cook County of a sum of money which now amounts to approximately 100 Million Dollars; that every dollar of the stolen money has been traced into the private bank accounts of Robert R. McCormick, Joseph Medill Patterson and Eleanor Patterson Schlesinger, and the other stockholders of the Chicago Tribune.

"That the Puritan Church submitted the evidence of the cowardly crimes committed by Robert R. McCormick, to the best lawyers; they pronounce it irrefragable and say that particularly for fixing crooked Judges to write crooked opinions, Robert R. McCormick should either be confined in an Insane Asylum, or taken out by a posse of indignant citizens and either shot, hanged to an oak tree, as was done

in Illinois, when horse-stealing instead of tax stealing was the occupation of gentry of the ilk of McCormick.

"That A. S. Trude, at the same time the General Counsel of the Chicago Tribune, and the President of the Board of Education, put through for the Chicago Tribune, a lease on some school property, which the Chicago Tribune sold in 1925, for an additional cash profit of $6,040,000.00, according to its own books.

(Page 8)

"That Robert R. McCormick was practically brought up by servants, while his mother was gadding about Europe. His only brother Medill McCormick, was pronounced in-[fol. 14] curably insane by the celebrated alienists, Patrick, Worthy and Jung.

"That the antics of Robert R. McCormick at social gatherings to make himself the 'life of the party'; the crimes he has committed; the 'railroads' of innocent men to prison in which he has engaged; his attempt to 'welsh' on a debt of honor; his association

(Page 9)

with professional murderers like Jack Gentleman, Mossy Enright, Gyp the Blood, Philadelphia Jack Barry and other hoodlums, indicate that there might be a screw loose in the mental machinery of Robert R. McCormick.

"His position as the head and control of an important newspaper which he occupies by accident of birth; his known hatred for the Jews, the Puritans and the Negroes; his insistance, that he be the political 'boss' of Illinois, and the head of the Republican Party in the U. S. A.; his control over 100 Million Dollars with the right in his obvious mental condition, to spend it as he chooses, compels the Puritan Church in its duty to its otherwise defenseless congregation, and to its neighboring defenseless congregations, to proceed to his criminal prosecution if he be sane, or his incarceration in a suitable institution, if he be insane.

"That the public records show that all the Judges who issued the obviously crooked orders and opinions for McCormick, his newspaper and his crooked law firm, were unqualifiedly advocated and re-elected by the 'support' of the Chicago Tribune, to places on the Circuit and Superior Court of Cook County, and to the Appellate and Supreme

Courts of Illinois, where they now sit passing judgment [fol. 15] on the lives and property of defenseless men and women, who have no way in the law of Illinois, to protect themselves against the depravities which such scoundrels will commit under the cover of a Court order and opinions.

(Page 10)

"That said McCormick has already started atrocities on the Jews, the Negroes and the Puritans by having one of his crooked Judges write a crooked opinion, under which a Puritan was 'railroaded' to the Cook County jail and held there, while unspeakable atrocities were inflicted upon him there, by Howard Ellis, of the notorious law firm of Kirkland, Fleming, Green, Martin & Ellis, the lawyers for McCormick in all his cowardly 'railroads' of innocent men, and his thieving operations to increase his private fortune.

"That Dwight H. Green, Governor of Illinois, by the orders of the same McCormick, is violating Article 5 of Section 6, of the Constitution of Illinois.

"That Werner Schroeder, McCormick's member from Illinois of the Republican National Committee, walks in and out of the back doors of the Chambers of the crooked Judges of the Supreme Court of Illinois, to make political deals for them and with them, and for said Robert R. McCormick.

"That neither life, nor property, nor reputation is safe, when the Constitution of Illinois, is violated; its law defied and its courts corrupted; when public officials are under the domination of a man whose public record is that he is a liar, a cheat, a thief, a court-fixer, a Constitution violator, a free lover, and an all-around scoundrel and a white livered coward.

[fol. 16] "That the Courts of Illinois are unable to cope with the power of its corporately owner newspaper; to withstand its bribery, its threats, its blackmail and its interference in the nomination and election of Judges.

(Page 11)

"That the Constitution of the U. S. A. provides that no citizen shall be deprived of life, liberty or property without due process, while due to the corrupt power wielded by said McCormick, the State of Illinois is deprived of the Republican form of Government guaranteed to it, by the Constitution of the United States of America.

"That because of the power of said McCormick and his Tribune and their corrupt use of money and influence with the public officials, it is impossible for the citizens of Illinois, to have the help of such officials, in bringing said McCormick and said Tribune before any Courts, where complaints against them will be given a fair trial.

"Therefore the joint meetings of the Ecumenical Council of the Puritan Church of the United States, petition the Federal Government at Washington, under the First and Fourteenth Amendment- to the Constitution of the United States to

"1) Convene a Federal Grand Jury:
"2) Place Illinois under Military Rule:
"3) Convene a Military Court:

(Page 12)

"4) Collect from Robert McCormick every cent of inheritance tax he owes on the Estate of Katherine Medill McCormick:
"5) Collect from the Chicago Tribune every cent it owes to Cook County:
[fol. 17] "6) Call a Constitutional Convention:
"7) Re-establish in Illinois the Republican form of Government.

"That Conrad Miner, Charles Norris and Harrison Parker, be and they are appointed to deliver this petition of our grievances to the proper United States Government authorities.

(Page 13)

STATE OF ILLINOIS,
County of Cook, ss:

"Harrison Parker being duly sworn deposes and says that he was appointed the Secretary of the Joint Meetings of the Ecumenical Council of the Puritan Church of the United States, held at the Masonic Hall, 32 West Randolph Street, Chicago, August 16, 1943, and in Chicago on February 5th, 1944; that Deacon William Ede presided; that the above is a true amended copy of one of the Resolutions unanimously passed at said meetings.

Harrison Parker.

"Subscribed and Sworn to this — day of January 1945. —— ——, Notary Public."

[fol. 18] EXHIBIT "B"

Founded in the year 1645, at Reading, Massachusetts, by Puritan refugees; incorporated by their lineal descendants

as

The Puritan Church—The Church of America

Office Of Its Chancellery At
LaGrange, Illinois
December 26, 1944.

"Hon. Francis Biddle,
Attorney General of the U.S.A.
Washington, D. C.

Dear Sir:

"I have been directed by the Ecumenical Council of the Puritan Church, to forward to our Federal Government their petition of their grievances. This, by its order, was held until after the recent national elections and the Christmas holidays.

"Robert R. McCormick, the editor of the Chicago Tribune and his crooked lawyer the eight times indicted Weymouth Kirkland, have introduced scoundrelism into journalism, hoodlumism into the practice of law, and gangsterism into the business life of Illinois. They have corrupted the entire system of Illinois, from ..... 's corrupt Municipal up to and including ..... 's crooked Supreme Court of Illinois:

"Neither life nor property nor reputation is any longer safe in Illinois. The 'scale' price of murder in Chicago has been reduced to $300.00. There is strict legal evidence that Weymouth Kirkland, a hoodlum, and Howard Ellis a [fol. 19] known writer of scurrilous anonymous letters, dressed up as the 'Tribune law firm' have been behind several attempted murder jobs in Chicago.

"These gentlemen by the corruption of the entire taxing machinery of Illinois, and the pollution of its Courts to allow their depravities, have made it possible for the Chicago Tribune a close private corporation, to steal from the defenseless State of Illinois, a sum of money which with penalty added, now amounts to the enormous sum of one hundred million dollars.

"Our Puritan mothers took their austere babies in their religious arms and fled Europe over the ocean, to bring up on American soil their little children to obey the laws of God; come what might come to them, come what might come to other men—to obey the laws of God at all times.

"Anarchy is the reverse of the law of God. According to the evidence in the possession of this Church, Robert R. McCormick and his Weymouth Kirkland are anarchists, destroying 'from within,' the government by law, set up with the blood of the direct sires of the present members of this Church, shed at Concord, at Bunker Hill and at Valley Forge.

"The local Grand Jury has been 'packed' by these unconscionable scoundrels, Robert R. McCormick and Weymouth Kirkland. Access to it has been sought and refused to men and women who have strict legal evidence of every allegation made in the enclosed petition of our grievances and repeated in part in this letter, and the legal right to appear with it before a Grand Jury.

[fol. 20] "We respectfully petition our federal government to convene in Chicago a special United States Grand Jury, in charge of a special prosecutor, in order that our complaints may have an orderly legal hearing such as is guaranteed to us, by the Constitution of the United States. We are,

Very truly yours, The Puritan Church, by Harrison Parker, Its Chancellor.

Founded in the year 1645, at Reading, Massachusetts, by Puritan refugees; incorporated by their lineal descendants

as

The Puritan Church—The Church of America

Office Of Its Chancellery At
LaGrange, Illinois

EXHIBIT "C"

"The Illinois League of Women Voters,

225 North Michigan Avenue, December 20, 1944.
Chicago, Illinois.

Dear Mesdames:

"This Church would like to work co-operatively and effectively with you, to amend the Constitution of Illinois. It can be rewritten, only if the fight necessary to accomplish it, be around the depravities which the millionaire stockholders of the Chicago Tribune have committed, under the present Constitution.

"There is in the possession of this Church, strict legal evidence, that by a violation of the Constitution of Illinois, for 66 consecutive years, the Chicago Tribune stole from the defenseless State of Illinois, a sum of money which with [fol. 21] interest and penalty added, now amounts to the approximate sum of 100 Million Dollars.

"In a vain attempt to hide this enormous steal, the Courts of Illinois, from ..... 's corrupt Municipal, up to and including ....., 's crooked Supreme Court, had to be either influenced, intimidated or bribed to ignore the Constitution of Illinois and defy the law passed by her legislature.

"One part of the stolen money was paid out by the Chicago Tribune to its multi-millionaire stockholders, as monthly cash dividends at the rate of 500% per month on their invested capital of $200,000; the other part was used to acquire a 'Canadian Empire' which is now appraised at 50 Million Dollars.

"The corporate surplus of the Chicago Tribune is over 100 Million Dollars; every cent of this would be used by the Chicago Tribune, if necessary to defeat any change in the present Constitution, which has permitted it with the connivance of crooked Judges, to steal the money it now has. All this evidence is available either to your lawyers, or to you in open meeting to which the Chicago Tribune should be invited to attend.

"The 20 odd Chicago Tribune stockholders do not want an income tax in Illinois; therefore, their privately owned newspaper will oppose you, and defeat you, unless you determine that the interests of the State are above the

interests of the multi-millionaire stockholders of the Tribune. By hypocritically concealing its private interest behind a plea of a public interest, the tax thieves who have had the control of the Chicago Tribune, for three gen- [fol. 22] erations have defeated every attempt made by the decent persons of Illinois, to re-write its antiquated Constitution.

"The seemingly public spirited editorial printed in today's Chicago Tribune, is a sample of the dastardly and cowardly influence which you and all other decent citizens must fight, if Illinois is to be rescued from its jungle state.

"Under the specious plea, that it is protecting the interests of the 'boys at the front,' the Tribune cunningly says, the Constitution must not be amended in their absence. Yet the records of Illinois show that while the 'boys' were at the 'front' in 1918, the Chicago Tribune stole from the State of Illinois, 12 Million Dollars, which it transferred to its stockholders as cash dividends. While 'our boys' are at the 'front' now, the Chicago Tribune with the connivance of the Kelly-Nash Machine which it keeps in power, has stolen another approximate three million dollars.

"A fight to re-write the Constitution will again end in naught. But a fight on the Constitution violations of the multi-millionaire Chicago Tribune, will as a 'cushion spot,' cause a public indignation which will result in the re-writing of the Illinois Constitution. Your organization having undertaken the task which it has, will lose its influence, unless it accomplish what it has undertaken.

"We trust that you will send your counsel to view the evidence to which we have referred to in this letter. If it be what we assert it is, we hope also that you either work co-operatively and effectively with us, or you permit us to [fol. 23] work co-operatively and effectively with you.

Very truly yours,

The Puritan Church

By: Harrison Parker,

Its Chancellor."

EXHIBIT "D"

Founded in the year 1645, at Reading, Massachusetts, by Puritan refugees; incorporated by their lineal descendants

as

The Puritan Church—The Church of America

Office Of Its Chancellery At
LaGrange, Illinois

"The Anti-Defamation League,
B'Nai B'Rith,
100 No. LaSalle St.,
Chicago 2, Illinois.

Gentlemen:

"The Puritans of the U.S.A., organized into their Puritan Church, would like to work co-operatively with the Jews of the U.S.A., organized into their Anti-Defamation League, to protect the institutions of the existing form of government, which if allowed to function naturally and without any change, would automatically protect Jew, Catholic, Protestant, Puritan, the laboring man, the Capitalists as well as all other groups.

"Under this form of government of the U.S.A. as it exists, all could and should be Americans. There should not be groups of C.I.O.'s, Manufacturers, Jews, Catholics, Protestants, Puritans, etc., which are being formed all over [fol. 24] the country, at an alarming rate. The very fact that such organizations are being organized and growing so rapidly, shows that there is a general feeling that the government is no longer 'a government of all the people, by all the people, for all the people,' as it was originally described by a Puritan, Theodore Parker, and repeated by Lincoln.

"The Puritan Mother grimly took her austere baby in her religious arms, and fled Europe over the ocean to bring up in a log cabin on American soil, her little child to obey God—come what might come to him, come what might to other men—to obey God at all times.

"To do that first, and all else as incidental to that, the direct sires of the present members of this Church, set up the existing form of government, with their blood shed at

Concord, at Bunker Hill, and at Valley Forge, fighting with guns along with Washington.

"The Puritan idea of government thus set up, is founded in human nature, and comes from the nature of God, who made human nature. To carry it out politically is to execute Justice, which is the will of God. This idea, in its realization leads to a democracy, a government of all, by all, for all.

"To enjoy the shelter and the prosperity which naturally flows from such a government, the Puritans invited the Jews, the Catholics, and all other decent men and women throughout the world, to come to America and partake here of the blessings which God always sends along with His shelter and His prosperity. And, they came by the millions, and working along with the Puritans, they made [fol. 25] the U.S.A. the most powerful nation of the whole world, and the envy of the tyrants whose shores the Jews and the Catholics and all other groups deserted to become Americans.

"Now, under the name of liberalism, with specious promises of securities which are impossible under a government operating under the orderly laws of God, some scoundrels, some agitators, some self-styled editors, some wolves in sheep's clothing, some men insane from indulgence in the rich food and the luxury which always flow from an orderly government, are attempting with cockeyed ideas on government, to destroy the form of government set up by the Puritans.

"These, and their ideas the descendants of the original Puritans in the Tenth Generation born on American soil, and still members of this Church, will oppose even if it be necessary to spill more blood on American soil.

"The law abiding, peace loving Jews have as much of a stake in maintaining the existing form of government in the U.S.A. as the Puritans have. Therefore, this Church is writing this letter to you, to invite you to work co-operatively and effectively with it, for our mutual self-protection and for the mutual protection of our children and our homes.

"In our previous letter to you, we stated that this Church had indisputable evidence that the Chicago Tribune, by a violation of the Constitution of Illinois, by a defiance of the law passed by her legislature, and by the corruption of the

entire Court system of Illinois, from ..... 's corrupt Municipal up to and including ..... 's [fol. 26] crooked Supreme Court of Illinois, had stolen from the defenseless State of Illinois, a sum of money, which with penalty and interest added, now acounts to the approximate sum of 100 Million Dollars.

"That one part of the stolen money had been checked out by the Tribune Company to its greedy multi-millionaire stockholders as cash dividends, at the rate of 500% per month, on an invested capital of $200,000; and the other part had been invested in a 'Canadian Empire' that is now appraised at 50 Million Dollars cash.

"That the steal was accomplished by the open notorious, cowardly and illegal connivance between the Tribune Company the owners of the Chicago Tribune, and two Jews: one ....., a Judge of the Circuit Court of Cook County; and the other Jacob Shamberg, the Assistant State's Attorney of Cook County.

"That both of these gentlemen had been paid a large salary by the State, to protect the State, and both according to the evidence in our safe deposit vault, had in order to gain the favor of the thief, the Chicago Tribune, criminally sold out the State which they had been paid to protect.

"That this Church intended to compel the Chicago Tribune to disgorge every cent of the stolen money, and drive both ..... and Jacob Shamberg off the public pay-roll, and into the obscurity that both had merited by their venal conduct in State affairs.

"That strict legal evidence of the disgraceful conduct of both these gentlemen now in the possession of this Church, was open to your lawyers.

[fol. 27] "That if the evidence in the opinion of your lawyers were not perfect, this Church would proceed no further; that if it were perfect, this Church desired the Anti-Defamation League to stand by its side in the fight it intends to make on all concerned, in this outrage on our government, if for no other reason than to prevent the fight on these men being called a fight against Semitism.

"Your answer to that letter addressed to the Anti-Defamation League is here quoted:

> "'I have referred this matter to our Director, Mr. Gutstadt, who desires that I advise you that this does

not fall within the purview of the Anti-Defamation activities, and we therefor will be unable to be of service to you.

Very truly yours,

Stanley S. Jacobs.'

"Notwithstanding this curt personal answer of the individual and unknown Mr. Jacobs to an important letter addressed to your League by this Church, the Puritan Church still desires to work co-operatively and effectively with the Jews, to protect the existing form of government for them as well as for the Puritans, and all other law-abiding and peace loving groups.

"The theft of a 100 Million Dollars from the State, by the Chicago Tribune, is a small matter compared with the pollution of the Courts of Illinois, which Robert R. McCormick, the Editor of the Chicago Tribune, personally ordered in a vain attempt to hide the enormous steal.

"The Courts under the form of government set up by the Puritans, are the last bulwark of our Liberties. When [fol. 28] they can be corrupted as the record shows they have been, by the named men, neither Jew, Catholic, Protestant, nor Puritan is any longer safe: life and reputation are in danger, and property is not worth the efforts to accumulate it; all are held at the sufferance of the scoundrel who can and will corrupt the crooked Courts.

"It is the opinion of our Trustees, that in our previous letter, we did not adequately describe the evidence in the possession of this Church, which it intends to use in a national fight against the corruption existing in the Courts, whether the organized Jews fight side by side with; or whether they fight against it. Here is the complaint of the Puritan Church.

"The public records of Illinois shows that for 66 consecutive years, the Chicago Tribune violated the Constitution, defied the law passed by her legislature, and corrupted the public officials and the Courts to aid it in its enormous steals.

"When the evidence of its crimes were discovered and presented to Jacob Shamberg, the Assistant State's Attorney, responsible for the prosecution of such crimes, he refused to act. With the identical facts and identical law, he proceeded against the Pioneer Tailoring Company,

which had committed against the State of Illinois, the same crime which the Chicago Tribune had. From the Pioneer Tailoring Company he recovered for the defrauded State of Illinois, every cent of the stolen money; there was less than $20,000 involved in the steal, while there was 100 Million Dollars involved in a like steal by the Chicago Tribune.

[fol. 29] "When Shamberg refused to act against the politically powerful thief, the Chicago Tribune, a taxpayer filed a lawsuit to compel it to disgorge its loot. Then Shamberg joined the Tribune lawyers in attacking and slandering the brave citizen. And he made before the Courts obviously crooked motions aimed to illegally defeat the State and aid the Chicago Tribune to cover its steal.

"One of these crooked motions was made by Shamberg before Judge ..... before referred to in Case 38-C-3209.

"The illegal order issued by ..... in that case, at the request of Shamberg, to swindle the State which paid both ..... and Shamberg to defend it, was more crooked than any ever issued by Judge Manton of Atlanta Prison.

"This Church has a certified copy of Shamberg's crooked Motion and ..... crooked order; no Court of final jurisdiction has ever upheld a single one of Shamberg's crooked Motions, or .....'s crooked order: these will be submitted to your lawyers. If they do not agree in what we say about them, this Church will proceed no further in this matter. If they do agree, the Anti-Defamation, as well as every other League of good citizens, should be fighting with the Puritans.

"This order of the faithless ..... in this litigation, appealed to the Supreme Court of Illinois, was so crooked that the entire Supreme Court of Illinois had to be either influenced, intimidated or bribed by the Chicago Tribune, to write a crooked opinion in case 24881, reported in 370 Illinois Supreme, at page 243, in a vain attempt to cover ..... judicial depravity; it is so crooked [fol. 30] that even a corrupted Supreme Court cannot cover it, even with adroit language; it could not end the litigation as it was corrupted to do; a cause of action still remains.

"If your lawyers will read this record and report after examining it, that it is not as vile as we have carefully de-

scribed it, this Church will proceed no further against either ..... or Shamberg. If your lawyers do report that it is as vile as we have described it, then the Anti-Defamation League cannot afford not to co-operate with the Puritan Church in its determination to clean up the crooked Court. Such Courts are as much a menace to the Jews as they are to the Puritans; a crooked Jew Judge is as dangerous a foe to law and order and humanity as a crooked Puritan, a crooked Protestant, or a crooked Catholic Judge.

"Yes, the public records show that Robert R. McCormick, the Editor of the Chicago Tribune, is an all around scoundrel; he and his family under the constant plea of more 'freedom for the press,' have stolen from the State which protected them, more money than was stolen by the Tweed Gang of New York, the Pendergast Gang of Kansas City and the Kelly Gang of Chicago. The Medill-McCormick Patterson fortune is the filthiest fortune ever accumulated in the U.S.A. according to the public records.

"Yes, the Chicago Tribune is a powerfully entrenched privately owned and corrupt newspaper.

"Yes, the Chicago Tribune has on hand a surplus of more than 100 Million Dollars stolen from the State of Illinois, which it does not hesitate to use to destroy men who are [fol. 31] brave enough to call it from Court records, a menace to our form of government, and Robert R. McCormick who has the stock control of it, a thief, a liar, and a court fixer.

"Yes, Robert R. McCormick has been the employer and business associate of hired assassins, like Mossy Enright, Jake Lingle, Jack Gentleman, Philadelphia Jack Barry and other Gangsters and Murderers.

"Yes, Robert R. McCormick employs as his General Counsel the 8 times indicted Weymouth Kirkland, who has also been the General Counsel for Moe Annenberg and other thieves, law-breakers and thugs; he is not allowed to practice law in the Courts of New York State. In the Appellate Court, in File 39804, there is proof that this Kirkland is a common hoodlum dressed up as a lawyer.

"Yes, Robert R. McCormick employs as the Managing Editor of the Chicago Tribune, the self-confessed 'news faker,' J. Loy Mahney; no government, no man, no property is safe with a news faker in charge of the news department of a daily newspaper.

"Yes, Robert R. McCormick introduced scoundrelism into journalism; hoodlumism into the practice of law and gangsterism into the business life of Illinois.

"Yes, in Chicago now dominated in all departments of its government by men personally selected by Robert R. McCormick, and bally-hooed into office by the dishonest praise of his corrupt Chicago Tribune, the 'scale' price of murder is $300. Any Jew, any Puritan, at any time, can be murdered on the Streets of Chicago, and the murderer will go unpunished for $300. This Church posssesses [fol. 32] the evidence of the 'scale' price, and it has strict legal evidence, that since the 'scale' price of murder was now dropped within the reach of all, the Tribune law firm founded by Robert R. McCormick, has tried several little 'murder jobs,' and has 'railroaded' at least one innocent man to Joliet Prison, where he was held for 8½ long years, and at least one innocent man to the Cook County Jail where he was held until the cowardly and unscrupulous Weymouth Kirkland uninvited, personally called at the Jail and there released the outraged man, as easily as he had been locked there by the Tribune law firm, in a vain attempt to blackmail him to dismiss an orderly legal lawsuit, which he had courageously filed against the black mailing, law breaking Constitution violating Chicago Tribune.

"With these facts before them, and a proffer of strict legal evidence to substantiate each and every allegation carefully made in this letter, we do not know what the Anti-Defamation League of the B'Nai B'Rith is going to do. But, we know what the Puritan Church is going to do. It is going to fight to restore and maintain in the U.S.A. the orderly law of God, as it is expressed in the Declaration of Independence, in the Constitution of the U. S. A. and the hearts of all decent men and women. And it is going to ask every man and woman in Illinois, with either property, children, or any other stake in the preservation of orderly peaceful government, to uphold it in spirit, if not with money, as the Anti-Defamation League is upheld by the money contributions of the Jews, to end the anarchy that now exists in Illinois, with Judge .....
[fol. 33] on the Circuit Court of Cook County, and Jacob Shamberg as the Assistant State's Attorney of Cook County.

"If the 'activities' of the Anti-Defamation League are confirmed, as Mr. Jacobs intimates in his curt letter, to

merely protecting the Jews, even when they are engaged in destroying 'from within', the institutions of government which should protect all of us, it is time to widen its 'activities' to protect the government which would automatically protect the Jews, if the Jews would join the Americans and compel it to function as it is outlined in the Declaration of Independence, in the Constitution of the U.S.A. and in the hearts of all decent men and women. We are,

Very truly yours,
The Puritan Church
By: .....
Harrison Parker, its Chancellor."

EXHIBIT "E"

Founded in the year 1645, at Reading, Massachusetts, incorporated by their lineal descendants as

The Puritan Church—The Church of America

Office Of Its Chancellery At
LaGrange, Illinois

"Dear Mr. Richardson: December 25, 1944.

"A very rich man of New York City has set up in New York City a trust fund, the proceeds of which are to be used to promote the activities of the Puritan Church. [fol. 34] Inasmuch as the Puritan Church has no debts and all its contemplated activities are adequately financed, I am turning the first check from that fund, over to you, with the recommendation that you take it to Knight and Wilson, the agents for the building where we have our Chancellery, and ask them to accept it as advance payment for several months rent. This is merely a suggestion. As I recall it you signed the Lease.

Sincerely,
Harrison Parker."

MOTION—January 8, 1945

"Now comes the defendant, Jacob Shamberg, by Kirkland, Fleming, Green, Martin & Ellis, his attorneys, and moves the Court for an order finding the plaintiff Harrison

Parker, guilty of direct contempt of Court for filing in the Office of the Clerk of the Circuit Court of Cook County, on January 4, 1945, a certain affidavit containing as a part thereof certain false, malicious, scurrilous and defamatory exhibits purporting to be certified copy of a resolution passed at the joint meeting of the Ecumenical Council of the Puritan Church of the United States and the College of Divines of the Brotherhood of the Ancient Order of St. John, held at the Masonic Temple, 32 W. Randolph Street, on August 16, 1943, and amended at the adjourned meeting held in Chicago on February 5, 1944.' And also a purported copy of a letter on the letterhead of the so-called 'The Puritan Church of America,' addressed to 'The Anti-[fol. 35] Defamation League, B'Nai B'Rrith, 100 N. LaSalle Street, Chicago, Illinois,' and purporting to be signed by 'The Puritan Church, by Harrison Parker, its Chancellor' and another certain purported copy of a letter on the letterhead of the 'Puritan Church—The Church of America,' addressed to the 'Honorable Francis Biddle, Attorney General of the United States, Washington, D. C.' under date of December 26, 1944, and purporting to be signed 'The Puritan Church, by Harrison Parker, its Chancellor,' in obstruction of justice and in abuse of the processes of the Circuit Court of Cook County and in manifest pursuance of a scheme to insult, defame, scandalize and blackmail the persons, firms and corporations mentioned in said scurrilous affidavit and exhibits thereto all in disrespect of and in derogation of the authority and dignity of the Circuit Court of Cook County;

"And defendant further moves the Court that said Harrison Parker be punished for said direct contempt of court, and that a mittimus issue forthwith.

"Kirkland Fleming Green Martin & Ellis."

I.

Abstract. (Page 1)

He denies that he is guilty of direct contempt for filing in the Office of the Clerk of the Circuit Court of Cook County a certain affidavit,

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in obstruction of Justice, and in the abuse of the processes of the Circuit Court of Cook County, and in manifest pur- [fol. 36] suance of a scheme to insult, defame, scandalize and blackmail the persons, firms, and corporations mentioned in said Affidavit and Exhibits thereto. And, he denies that any of those instruments filed were in obstruction of justice and makes his answer in opposing the motion of the defendant to have him punished for direct contempt of Court, and a mittimus issue forthwith; that each, every and all of the Exhibits attached to the Affidavit were and are a part of the records and/or communications of the Puritan Church as an organized and existing religious corporation protected by the laws of the State of Illinois and the Constitution of the United States; that each and all of said records and communications are properly chargeable to, and the responsibility of said religious corporation

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and he acted in his official capacity as an officer of said religious corporation, and not as an individual, in complying with the order entered against him, which has brought on this contempt proceeding; that the orders requiring him or other parties to bring in any matters pertaining to, or having to do with the Puritan Church, is in contravention of those rights guaranteed to him and them, by the Constitution of the United States guaranteeing freedom of religious worship; that orally and in writing, he had apprised the Court of its illegal conduct and the illegal conduct that it had permitted and sanctioned on the part of the defendant and his counsel; that notwithstanding, the Court illegally and unconstitutionally permitted the defendant repeatedly to violate the constitutional guarantees, and enter [fol. 37] illegal orders requiring Parker to bring into

Court and divulge those things and matters which the Constitution forbids being done by a litigant, by the Court, or both; that all the writings submitted in his Affidavit dated January 8th, were exact copies

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of writings that are properly part and parcel of the Records of the Puritan Church; that if such be true, then the obstruction of justice and the abuse of the civil processes of the Circuit Court were occasioned and brought about by the acts of the defendant; that the defendant for a long time was well aware of most of the contents of the documents that would be filed in carrying out the order of the Court; that the counsel for the defendant had been furnished with finished partial copies of most of said documents, and they knew that those said writings would be filed in this matter, in the event that such an order was prayed for by the defendant; that if there be any insult, defamation, scandal and blackmail, it is on the part of the defendant and his counsel who over a period of years preceding this, have indulged in a vile, vicious, illegal and criminal conspiracy

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to insult, defame, scandalize and blackmail him; that all the contents of said letters, documents and papers are true; that the defendant could refute them in a proper legal proceeding, but not in this one wherein the object of the defendant is to do by indirection that which he has not seen fit to do by direction; that the Affidavit is a truthful and honest recitation of certain facts which have been com- [fol. 38] mitted by those persons referred to and described in said Affidavit and Exhibits; that the acts and doings of the persons described in said Affidavit may be scurrilous and defamatory; he denies that the Affidavit by truthfully reciting said acts and facts is scurrilous and defamatory; that he intended no disrespect of said Court in filing the Affidavit; that the disrespect for the Court was by the defendant, by an attempt to entrap him, into what the defendant now calls 'direct contempt of Court':

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that the defendant now complains of an act done in following the order of this Court directed to him and entered at

the behest of the defendant who all the time was knowingly attempting to entrap him; that he intended no contempt of this Court, but on the contrary, by the order of the Court, entered on the motion of the defendant, has followed strictly the ruling of this Court, and has filed a truthful, honest, affidavit in answer thereto:

"That he had been paid a salary of $25,000 a year as the Business Manager of the Chicago Tribune; that while there, he was told to deliver $150,000 in Bonds of the Japanese Imperial Government, to a certain partnership of lawyers located on Clark Street, to be used, to induce the Supreme Court of Illinois, to write an opinion favorable to the Chicago Tribune in the matter of its lease of real estate owned by the Chicago Board of Education;

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that he refused to deliver said Bonds or to have anything to do with said illegal transaction; that he then and there resigned his said position and said salary that went with it; [fol. 39] that following his resignation he was asked by Mrs. Medill McCormick to act as a companion and entertain Medill McCormick, the brother of Robert R. McCormick, pending the arrival in the U.S.A. from Europe, of Dr. Jung; that Doctors Worthy and Patrick, alienists of Chicago, had previously declared said Medill McCormick to be

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incurably insane; that he went with said Medill McCormick to Chattanooga, Tennessee, where said Medill McCormick, his wife, Dr. Jung on his arrival, and he lived at the Patton Hotel; that Dr. Jung had told him, there, that there was a stain of insanity in the McCormick family: that in 1914 Medill McCormick called upon him, while he was the Publisher of the Chicago American, and said:

> 'My brother is in a jam with another man, over the man's wife; a certain Judge in Chicago, has agreed to drag the husband into his Court room and there compel him to release his wife to my brother, if all the newspapers in Chicago, will suppress all the news of what happens there:'

that he told said McCormick, that he was a 'hired man'; that said McCormick's appeal was to Mr. William Randolph

Hearst, who owned the newspaper; that said Medill McCormick told him he would 'rue the day' when he refused this request and vowed eternal hatred of the McCormick family and the Chicago Tribune against him;

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that later he was asked by William H. Field, the Vice President of the Tribune Company, to appeal the matter by [fol. 40] telephone, to Mr. William Randolph Hearst, at his Ranch in San Simeon, California; this he did and secured from Mr. Hearst the instructions to omit from the news columns of the Chicago American, all reference to the matter of Robert R. McCormick *vs.* Edward Adams, Bankrupt, number 22619, dated September 26, 1914, in the Federal Court of Chicago, and Edward S. Adams *vs.* Robert R. McCormick, in case 310206, dated August 5, 1914, in the Superior Court of Cook County.

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"That on August 25, 1932, he commenced an action at law against the Tribune Company for libel; that thereafter, Weymouth Kirkland, in the office of said Kirkland, told him that Robert R. McCormick could not allow the Courts of Illinois, to assess any damages against newspapers; that in conformity with said policy, said McCormick had hired him, (Kirkland), to 'fix' the Appellate Court of Chicago, to reverse and set at naught a verdict of $75,000 which a jury had awarded to William Fenimore Cooper, in the case of William Fenimore Cooper *vs.* The Illinois Printing and Publishing Company—('The Chicago Examiner'); that he, (Kirkland), upon specific instructions from Robert R. McCormick in the future, would be compelled to fix all Judges and Juries to set at naught all damage claims which he (Parker), might have against the Chicago Tribune; that Kirkland then and there, advised him as a friend, 'to run along' and 'not mix it' with said Robert R. McCormick in the Courts; that he examined in the Appellate Court, the record there, in William Fenimore Cooper *vs.* Illinois Printing and Publishing Company case, and there found [fol. 41] that Kirkland had spoken the truth when he told him that the Appellate Court had been fixed to set aside the award of the Jury; that Kirkland had stated the truth

when he said that McCormick would stop at nothing to pervert Judges and Juries and prevent justice being done:

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"That he decided that neither as a man nor as a citizen would he, or could he 'run along' and not 'mix it' with said Robert R. McCormick:

"That thereafter Howard Ellis of said Kirkland's law firm, in the Kirkland's law office, said to him: 'If you do not dismiss that libel suit against the Tribune, at your own cost, the Tribune is going to get rough with you': that

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Robert R. McCormick had employed on the Tribune's Staff, police characters, ex-convicts and murderers, like Mossy Enright and Jack Gentleman; that he well knew that to proceed with his libel suit against the said Tribune Company, was to run the risk of either having said Tribune Company either harm him physically, or assassinate his reputation in the columns of said newspaper; yet he believed it to be his duty as a man and a citizen, to fight such brazen corruption, rather than to yield to it and encourage the debauchery of the institutions of government;

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that at the time of said threat by Ellis, he was a party defendant in some civil litigation in the Appellate Court of Illinois, entitled Mae Quinliven *vs.* North American [fol. 42] Trust Company, numbered 36295; that shortly after the meeting with Ellis, Judge ..... handed down in said litigation, an opinion under which he had either to pay to said Mae Quinliven $7,000, or be liable to be confined in the debtor's cell of the Cook County Jail for six months; that the Court Record showed that he had never seen Mae Quinliven until he met her in Court, and he had never transacted any business with her directly, or indirectly; that he did not owe her any money; that he entered the debtor's cell of the Cook County Jail; that the following day he read in the Chicago Tribune, a sensational article about his confinement there; that it dawned upon him there, the import of Ellis' threat;

"That Ellis then sent word to him in the Jail, that he

(Ellis), and some friends would pay the said $7,000 to said Mae Quinliven, if he would promise in return therefor, to dismiss his libel suit, still pending against the said Tribune;

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that he answered Ellis by stating that 'he preferred the Jail:'

"That shortly after he had refused Ellis' offer, and while he was still in the Debtor's cell at the Cook County Jail, Warden Moneypenny informed him, that a man armed with a knife had been found in his cell and that the armed man had been placed there by the Tribune law firm of Kirkland, Fleming, Green & Martin, to kill him in said jail; that four months later, another attempt upon his life was made, while he was still in said County Jail; that two of his cellmates had almost died of eating cake which [fol. 43] contained arsenic and which had previously been offered to him; that from the Jail he wrote a letter to Robert R. McCormick, in which he charged that McCormick through his lawyers, had tried twice to murder him and thus dispose of him, as well as the still pending libel lawsuit;

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that the next day unsolicited by him, Weymouth Kirkland appeared in person at the Cook County Jail, and there, released and freed him, without any further effort or act upon his part:

"That the Constitution of Illinois provides:

> 'Every person and corporation shall pay a tax in proportion to his, her or its property;'

the general assembly of Illinois has determined that the capital stock tax of domestic corporations shall be paid by the corporation and nof by the holder of it; that taxable property that has been omitted when discovered, must be listed and assessed by taxing officials.

"That in the summer of 1935, he presented to Jacob Shamberg, an Assistant State's Attorney of Cook County, and the defendant herein, evidence that certain personal property owned, possessed and controlled by the Tribune Company of enormous value, had for 66 years

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been omitted from the tax rolls of Cook County; that upon the receipt of such evidence, it became the duty of said Shamberg to immediately institute legal proceedings to collect from said Tribune Company, the money due to Cook County for taxes, on the property not listed on its books, and not on the tax rolls of Cook County, according to the presented evidence; instead of doing his sworn duty, [fol. 44] said Shamberg refused to act against said Tribune Company;

"That as a taxpayer, he filed a complaint before the Board of Tax Appeals, to compel the listing and assessing of the omitted taxable property of said Tribune Company that was set forth under oath;

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In the trial before the Board of Tax Appeals, Weymouth Kirkland, instead of answering the sworn complaint then before that body, said of him, to the Board of Appeals and those persons there assembled:

> 'You rat . . . you dirty rat . . . you blackmailer . . . you contemptible blackmailer . . . you ought to be taken for a ride:'

that immediately thereafter, he started in the Superior Court of Cook County, a suit against said Kirkland for slander; that Judge ..... dismissed the lawsuit upon the motion of said Kirkland; his decision was appealed to the Appellate Court of Chicago; there, the lawsuit was also dismissed by an opinion written by Judge ..... who in order to dismiss it there, had to set aside in a long opinion, what had heretofore been the established American rule of law, and the law of Illinois, and substitute therefor, the English Rule which had never been the law of Illinois; and although Kirkland had not uttered the objectionable words in a Court, Judge ..... ruled that the Board of Tax Appeals of Cook County is a quasi-judicial body, in order to sustain Judge Sabath's decision;

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"That he then started a mandamus lawsuit to compel the taxing officials to list and assess the taxable property [fol. 45] of said Tribune Company that had been omitted from the tax rolls; that the Supreme Court of Illinois decided in 367 Ill. 559, 569, that owners are not necessary or proper parties to a mandamus lawsuit; notwithstanding this clear ruling, Judge ..... of the Circuit Court of Cook County, upon the motion of said Kirkland's law firm, admitted the Tribune Company as a party defendant in a new mandamus lawsuit that had been started to list and assess the taxable property of said Tribune Company that had been omitted from the rolls;

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Then this lawsuit upon the motion of said Shamberg was dismissed by Judge Joseph Burke.

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"That the formation for a fourth mandamus lawsuit to compel the listing and the assessing of the taxable property of said Tribune omitted from the tax rolls, has been laid; that he is preparing to proceed; that no Court of final jurisdiction has sustained any of the objections of said Shamberg and Kirkland.

"That thereafter, his libel suit against the Tribune was tried; that two days were consumed, with direct examination; that three months occupied in cross and introducing 200,000 pages of testimony and exhibits; that the Jury deliberated for less than an hour and returned a not guilty verdict, as Kirkland had promised would happen, three years before, when Kirkland told him why he would never win, either against Robert R. McCormick or his said Tribune Company:

"That he had been advised by a lawyer, that it was his duty as a man, a citizen and a taxpayer, to write the facts [fol. 46] about the tax on the omitted taxable property of said Tribune Company, to the Cook County Grand Jury; this he did; for writing a letter to the Grand Jury,' he was cited for contempt of Court by one John W. Norkett,

a Private Detective employed by the said Tribune Company and its law firm;

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the exact charge in Information A40, signed by said Norkett was 'writing a letter to the Grand Jury;' by his (Parker's) answer it was proved that it was not contempt of Court to write a letter to a Grand Jury; so Judge . . . . . found him guilty of 'obstructing justice' and sentenced him to 10 days in the Cook County Jail; this, he appealed to the Supreme Court of Illinois, in case 25595; there, he proved to the Supreme Court that writing a letter to a Grand Jury was not obstructing justice; so that the Supreme Court of Illinois based its decision on an entirely new charge 'writing letters to a grand jury which had a tendency to obstruct justice;' for this he must serve 10 days in the Cook Jail; (Reports of the Supreme Court of Illinois, Vol. 374, page 524); that he could not appeal this to the United States Supreme Court, because he had not raised the question of his rights in his first answer; therefore he went to the Cook County Jail for 10 days.

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"That Weymouth Kirkland, lawyer for Robert R. McCormick, has boasted that all the Courts of Illinois can be 'fixed' in matters in which Robert R. McCormick has a money interest.

(Page 23)

"That it is of little importance to the State of Illinois, or to the United States if he is confined in jail for six [fol. 47] months, as has been suggested to the Court herein, by the Tribune lawyers, Kirkland, Fleming, Green, Martin and Ellis, who represent Shamberg; but it is of the utmost importance to the State of Illinois, and to the United States, and to the People of both, that said Robert R. McCormick, said Kirkland and their agents and employees be now and forever prevented from continuing their own calculated scheme of insult, defamation, scandalizing, blackmail, terror,

(Page 24)

bribery, murder, theft, perjury, fraud, libel, corruption, anonymous letter writing and forgery, commenced in 1911, when said McCormick became President of said Tribune

Company, and said Kirkland became counsel for said McCormick and said Tribune Company; that during the 34 years in which this scheme to make money has been in operation, said Tribune Company, said McCormick and said Kirkland, have been able to gain their too-frequently illegal ends by terrorizing those who oppose them; that over this long period said Tribune Company, said Kirkland and their hirelings have shown not only their contempt for all other citizens of this State, but for the State of Illinois, and the United States of America; that their scheming campaigns have resulted in the debauchery of many public officials in the State of Illinois, and unless stopped will result in the complete destruction of the government of the State of Illinois.

(Page 25)

"That certain rights guaranteed to him by the Constitution of the U.S.A. and the Constitution of the State of [fol. 48] Illinois, have been violated; that he has been deprived of the free exercise of religion and the right to petition his government for a redress of certain provisions of the First Amendment to the Constitution.

(Page 25)

Harrison Parker

* * * * * * *

Duly sworn to by Harrison Parker, jurat omitted in printing.

(Attached to this Answer was the Affidavit set forth on Page 6, hereof; the Resolution of the Ecumenical Council set forth on Page 7, hereof; the Biddle letter set forth on Page 16, hereof; the Illinois Woman's Voters League letter set forth on page 18, hereof; the letter to the Anti-Defamation League on Page 21, hereof, and the letter to Dr. Agnes Richardson set forth on Page 31, hereof, and the tax statement on Pages 46-50, hereof.)

The statements here appearing, both for the year 1923, are typical for each of the other 66 consecutive years of flagrant tax evasion by the Tribune Company, com-[fol. 49] plained of to the Supreme Court of Illinois in People ex rel. Park *vs.* Whealan, 370 Ill. 243.

That on page 47, hereof, for 1923, appears in the public records of the Assessor of Cook County, Illinois. Its

accuracy has been sworn to by L. A. Hodson, an attorney for the Tribune Company.

That on page 49, hereof, also for 1923, appears in the public records of the Clerk of the Supreme Court, at Springfield, Illinois. Its accuracy has been certified by a Commissioner of the Supreme Court of Illinois who examined the books of the Tribune Company in connection with litigation between Tribune stockholders: Lloyd *vs.* Lloyd, 341 Ill. 461.

Both statements as they here appear, were in the record and within purview of Justice ..... then Chief Justice of the Supreme Court of Illinois, when he so peremptorily dismissed this important litigation brought by the State of Illinois, involving such important rights, principles, and property of the citizenry, as well as the constitutional rights of a sovereign state, without any heed to the issues set forth.

The Tribune Company dared not go to trial, as Justice ..... well knew. And by this maneuver, he deprived the State of a trial, thus foreclosing his state from simple justice. To insure the Tribune's escape from its vulnerable position, occasioned by its long-continued defrauding of its own state, he made short shrift of this most important litigation with an opinion of 35 lines.

[fol. 50] Year .....
Town .....

1923

1. Horses .....
2. Cattle .....
3. Mules & Asses .....
4. Sheep .....
5. Hogs .....
6. Steam Engines .....
7. Safes .....
8. Billiard Tables .....
9. Carriages & Wagons .....
10. Watches & Clocks .....
11. Autos .....
12. Piano Fortes .....
13. Melodeons & Organs .....
14. Franchises .....
15. Annuities & Royalties .....
16. Patent Rights .....

17. Steamboats, Vessels, etc.	.....
18. Merchandise	.....
19. Material & Mfg. Articles	.....
20. Manufacturer's Tools, Implements & Machinery	.....
21. Agricultural Tools, Implements & Machinery	.....
22. Gold or Silver Plate	.....
23. Diamonds and Jewelry	.....
24. Moneys of Bank, etc.	.....
25. Credits of Bank, etc.	.....
26. Moneys of other than Bank, etc.	.....
27. Credits of other than Bank, etc.	.....
28. Bonds or Stocks	.....
[fol. 51] 29. Shares of Stock of Companies not incorporated by laws of this State	.....
30. Property of Pawnbroker	.....
31. Property of Companies and Corporations other than property hereinbefore enumerated	50,000
32. Bridge Property	.....
33. Property of Saloons and Eating-houses	.....
34. Household or Office Furniture	.....
35. Investment in Real Estate	.....
36. All Other Property	1,051,000
Total Full Value	1,101,000
Total Assessed Value	550,500
Corrected by Board of Review	550,500

The Tribune Company

Condensed Balance Sheets and Statement of Net Profits From Operations and Dividends Paid

(From Lloyd *vs.* Lloyd, 341 Ill. 461)

Assets as of December 31, 1923

Leasehold	$ 203,097.82
Building	1,892,817.47
Plant, Machinery & Equipment	3,010,546.25
Investments	3,404,322.84
Chicago Building Co. Stock	2,911,900.00
Working Assets	1,407,227.95
Current Assets	3,068,762.84
Real Estate, excluding Tribune Building	260,120.64
Total Assets	$16,158,795.81

Liabilities

Capital Stock	$ 200,000.00
[fol. 52] Surplus	9,831,705.96
Current Liabilities	2,199,469.95
Service Liabilities	101,758.95
Reserve for Doubtful Accounts	328,912.20
" " Taxes	727,938.97
" " Dep. Tribune Bldg.	425,877.61
" " Leasehold	54,375.95
" " Machinery & Equip't	1,442,259.82
" " Real Estate except Tribune Building	19,136.40
Miscellaneous Reserves	827,360.00
Total Liabilities	$16,158,795.81
*Net profits for the year	$ 4,365,047.40
Dividends	3,300,000.00

*From operations before payment of dividends.

ORDER

Order of Judge Daniel P. Trude, dated January 15, 1945, committing Harrison Parker to the Cook County Jail for 90 days:

"This cause coming on this day to be heard on the written motion of the defendant, Jacob Shamberg, for an order finding the plaintiff, Harrison Parker, guilty of direct contempt of Court by reason of his having filed in the office of the Clerk of the Circuit Court of Cook County, on January 4, 1945, and again on January 15, 1945, certain Affidavits containing as a part thereof certain false, malicious, scurrilous and defamatory exhibits purporting to be in obstruction of justice and in abuse of the processes of the Circuit Court of Cook County and in manifest pursuance of a scheme to insult, defame, scandalize the per- [fol. 53] sons, firms and corporations mentioned in said scurrilous affidavit and exhibits thereto; all in disrespect of and in derogation of the authority and dignity of the Circuit Court of Cook County;

"The Court Finds:

"1. It has jurisdiction of the parties and of the subject matter hereof;

"2. That on January 4, 1945, and again on January 15, 1945, said Harrison Parker filed in the Office of the Clerk

of this Court said scurrilous Affidavits containing as exhibits thereto and as a part thereof a purported 'certified copy of a resolution passed at the joint meeting of the Ecumenical Council of the Puritan Church of the United States and the College of Divines of the Brotherhood of the Ancient Order of St. John, held at the Masonic Temple, 32 W. Randolph Street, on August 16, 1943, and amended at the adjourned meeting held in Chicago on February 5, 1944' and also a purported copy of a letter on the letterhead of the so-called 'Puritan Church of America,' addressed to 'The Anti-Defamation League, B'Nai B'Rith, 100 N. LaSalle Street, Chicago, Illinois,' and purporting to be signed by The Puritan Church, by Harrison Parker, its Chancellor;' and another certain purported copy of a letter on the letterhead of the 'Puritan Church—The Church of America,' addressed to the 'Honorable Francis Biddle, Attorney General of the United States of America, Washington, D. C.' under date of December 26, 1944, and purporting to be signed 'The Puritan Church, by Harrison Parker, its Chancellor,' which scurrilous affidavit and exhibits thereto should be by reference incorporated in [fol. 54] this order and made a part hereof for greater certainty;

"3. That the filing of said scurrilous affidavit and exhibits thereto by said Harrison Parker constitutes an obstruction of justice and an abuse of the processes of this Court, which conduct of said Harrison Parker took place while this court was in open session and tended to lessen the dignity and authority of this Court;

"4. The Court further finds that said Harrison Parker, who is now here present in open court, is, by reason of said conduct guilty of direct contempt of this Court.

"Wherefore, the premises considered:

"It is ordered and adjudged, that said scurrilous affidavits filed by said Harrison Parker in the office of the Clerk of this Court on January 4, 1945, and again on January 15, 1945, and containing as Exhibits thereto 'certified copy of a resolution passed at the joint meeting of the Ecumenical Council of the Puritan Church of the United States and the College of Divines of the Brotherhood of the Ancient Order of St. John, held at the Masonic Temple, 32 W. Randolph Street, on August 16, 1943, and amended at the adjourned meeting held in Chicago

on February 5, 1944,' and also a purported copy of a letter on the letterhead of the so-called 'Puritan Church of America,' addressed to 'The Anti-Defamation League, B'Nai B'Rith, 100 N. LaSalle Street, Chicago, Illinois,' and purporting to be signed by 'The Puritan Church, by Harrison Parker, its Chancellor;' and another certain purported copy of a letter on the letterhead of the 'Puritan Church—The Church of America,' addressed to the 'Hon-
[fol. 55] orable Francis Biddle, Attorney General of the United States of America, Washington, D. C.' under date of December 26, 1944, and purporting to be signed 'The Puritan Church, by Harrison Parker, its Chancellor,' be and the same is hereby incorporated by reference in this order and made a part hereof with the same force and effect as if set forth herein; and

"It is further ordered and adjudged that said Harrison Parker was and is and hereby is adjudicated guilty of and in direct contempt of this Court; and

"It is further hereby ordered and adjudged that said Harrison Parker stand committed to and be confined in the County Jail in said County of Cook and State of Illinois for ninety days;

"The Court further hereby orders and adjudges that a warrant of commitment do now issue in due form for the arrest forthwith of said Harker Parker, directed to the Sheriff of Cook County, in the State of Illinois, and that when arrested by said Sheriff said Harrison Parker be committed to said jail and that he be there held for ninety days until he shall be otherwise discharged from said imprisonment by due process of law.

Enter:

Daniel P. Trude
Judge.

"Mittimus stayed until January 22, 1945, at 10 A. M.
Daniel P. Trude,
Judge.

"Done this 15th day of January, 1945."

MOTION TO DISMISS

[fol. 56] Motion of Jacob Shamberg to dismiss then and there, the cause entitled Harrison Parker *vs.* Jacob Shamberg, No. 43-C-13381.

ORDER

Order of Judge Trude, dismissing the cause as follows:

"On motion of Kirkland, Fleming, Green, Martin & Ellis, Attorneys for the defendant, to have the cause dismissed on the merits and the Court being duly advised in the premises;

"It is hereby ordered that this cause be and the same is hereby dismissed on the merits with cost to the defendant.

Enter:

Daniel P. Trude.

"To the entry of the above order the plaintiff Harrison Parker objects.
January 15, 1945.

Daniel P. Trude
Judge."

PETITION

Petition of Jacob Shamberg dated January 15, 1945, for rule to show cause why Harrison Parker should not be punished for contempt of Court.

Order of Judge Trude dated January 15, 1945, for Harrison Parker to answer within five days.

Order of Judge Trude extending the time to answer for Harrison Parker.

ANSWER OF HARRISON PARKER TO PETITION FOR RULE TO SHOW CAUSE—January 22, 1945

Abstract (Page 1)

"That E. E. Wenger, a Notary, did on February 15, 1944, issue subpoenas for said Elmer Benton and said Dr. Richardson

[fol. 57] (Page 2)

"That he, Harrison Parker, did, on March 1, 1944, file a second sworn petition setting forth his objections to the illegal, improper and unconstitutional 'fishing expedition' on which the defendant and now the petitioner had embarked, and he did request the Court that the defendant and his attorney be restrained from proceeding to take depositions of said Elmer Benton and said Dr. Richardson,

having to do with and pertaining to the Puritan Church, or the Brotherhood of the Ancient Order of St. John; that in his sworn petition he had pointed out to the Court, that none of said parties were, or had ever been, nor could they properly be, parties to the litigation Parker *vs.* Shamberg, or could they ever be called upon to testify as Shamberg and his lawyers were attempting to force them to do; that he had stated to Judge Harrington, on March 2, 1944, that he thought the records of the Puritan Church and the Brotherhood of the Ancient

(Page 3)

Order of St. John were then in St. Louis; that said Shamberg had on March 22, 1944, filed a petition to compel Dr. Richardson to bring in the books and records of the Puritan Church and the Brotherhood of the Ancient Order of St. John, despite the fact that on February 22, 1944, she had testified under oath, that she never in her life had in her possession any papers of the Puritan Church; that on March 22, 1944, said Shamberg again improperly, illegally and despite the provisions of the Constitution of the U. S. A. contrary thereto, did file another petition under oath, setting forth, that the records of the Puritan Church [fol. 58] were material to his cause, and that he and/or they were informed and therefor- believed, that he (Parker), had formed the Puritan Church as a means to carry on an extortion; yet,

(Page 4)

in fact, no extortion has ever existed and therefore could never be proved; it exists only in the mind of the person making the Affidavit on said petition; that said petition misrepresented what he (Parker) had said, and falsified his words and their meaning; that he (Parker) had not identified over 1100 letters and pamphlets which contain threats to kill and harm a large number of persons, firms and corporations, including numerous Judges and public officials; he denies that he has ever made a threat to kill anyone; he has said that persons faithless to the public trust should be given publicity and he has given it, in order that orderly government should exist in the U. S. A.; that in his

(Page 5)

deposition he had stated that the Puritan Church is going to try to hang two Judges of the Circuit Court and one Judge of the Appellate Court, because of their misdeeds such is the penalty that conduct such as theirs, has often received; that Shamberg had concluded his petition that this statement by Parker was sufficient grounds for Shamberg's lawyer to state under oath, that said Puritan Church is in a conspiracy with Parker; that the books and records of the 'church' will tend to prove the allegation in his answer, that Parker, is a blackmailer.

[fol. 59] (Page 6)

"That on October 6, 1944, said Dr. Richardson and said Benton did appear and did again under oath say that she had no books and records of the Puritan Church in her possession; that all she had was its literature; that when Dr. Richardson was asked for the third time, if she had the books and records of the Puritan Church, she refused to answer.

(Page 7)

"That on October 18, 1944, Shamberg again illegally, improperly and against the provisions of the Constitution of the U. S. A. prayed, that a rule to show cause issue against said Dr. Richardson and said Benton for their refusal to answer interrogatories.

"On November 10, 1944, said Richardson and Benton on order of the Court filed their sworn answers.

(Page 8)

"That conditions of August 2, 1943, which Dr. Richardson had said were true then, were not true on December 4, 1944.

(Page 9)

"That on December 4, 1944, he (Parker), had volunteered to correct the mistaken impression under which Judge Trude was laboring, by stating into the record under oath, that the records of the Puritan Church had been in Canada, since before the Shamberg lawsuit was started, except for the occasion when they had been in St. Louis, and another occasion when they had been in Wisconsin; that at the

same time, he informed the Court, that it had no jurisdiction over the Trustees, or over said records; that on the same day

[fol. 60] (Page 10)

he informed Judge Trude, that the Puritan Church considered it its duty to support the government, by exposing corruption wherever it was found; at the same time, he told Judge Trude that the Trustees of the Puritan Church had not been served in the Parker-Shamberg lawsuit; and as best he could on that occasion, he told Judge Trude, that the Constitutions prohibited his Court from doing that which it had done, and which it was then doing, namely: inquiring into a church legally organized and existing under the laws of the State of Illinois; that the Court was not only permitting Shamberg and his counsel to go on a 'fishing expedition' which had never been permitted under the law, but had — permitting this 'fishing expedition' in the records of a legally organized Church.

(Page 11)

"He, Parker, also testified on December 4, 1944, that there was not a single record of the Puritan Church in Illinois, for the reason that the Church had decided that with the illegal accomplishments of the law firm of Kirkland, Fleming, Green, Martin & Ellis who represent Shamberg, it would be safer for a Church to have its records outside of the State, and best in Canada. At the same time, he (Parker), testified, that certain Judges had violated the Constitution and that in his opinion, for that crime they should be hanged which crime, history divulges, has been the proper and frequent penalty paid by traitors; that on August 21, 1944, Judge Harrington had ruled, that he need not answer any questions by Shamberg's lawyers with regard to the Puritan Church and the [fol. 61] Brotherhood of the Ancient Order of St. John, nor need he produce records or papers of either of said organizations;

(Page 12)

Yet after said ruling by Judge Harrington, when this same matter was heard by Judge Daniel P. Trude, said Shamberg by his counsel had presented a petition similar to that refused by Judge Harrington, and had obtained the per-

mission of said Judge Trude to engage in the 'fishing expedition' in which they were now engaged; that he is unable to determine legally, whether he must obey the said order of Judge Harrington, or whether he must obey the later order of Judge Trude.

(Page 13)

"That on January 2, 1945, Shamberg made a motion before Judge Trude for a more sweeping 'fishing expedition,' into the records of the Puritan Church and the Brotherhood of the Ancient Order of St. John, commencing with January 1, 1940, to January 2, 1945, in face of the fact that the proceeding Parker *vs.* Shamberg was filed December 8, 1943. (See page 1, this abstract.)

"That Shamberg and his counsel, in asking in this motion for one Judge of the Circuit Court to over-

(Page 14)

rule the order of another, were attempting to give their reprehensible and improper conduct, a semblance of legality, by proclaiming that they were proceeding under Supreme Court Rule 17, paragraphs 8 and 9;

"Then and there, he Parker, again reminded Judge Trude, that the records asked for were in Canada and [fol. 62] moreover, they were not relevant to the issues then before the Court, as said Judge Harrington had ruled on August 21, 1944:

"That, he then realized that he was confronted with said order of said Judge Trude and must obey it, insofar as he could, and he, did comply with said order as best he could, by filing his Affidavit which included as exhibits, those documents which had come into his possesison shortly before that time.

"That on January 4th he (Parker), did file in the Office of the Clerk of the Circuit Court of Cook County, his Affidavit in which he had truthfully answered all questions along with it, and as a part thereof, certain exhibits which had properly come into

(Page 15)

his hands shortly before and were in his hands at said time; that in his Affidavit he did not, as Shamberg alleges in his petition for rule to show cause, swear inter alia, that in November 1944, he had destroyed all originals, duplicate

originals and copies of all letters, telegrams, memoranda, etc., passing between Conrad Miner, Charles Norris, Homer Race, and himeslf: nor did he in said Affidavit swear 'that he had also destroyed in November 1944, all Minute Books, records, etc., of and concerning the said so-called Puritan Church, and said so-called Brotherhood of the Ancient Order of St. John,' except for the said seven filed documents (on pages 75, 107, 108, 124, 126, 132, 133), and he denies that this said Affidavit and said documents were filed in any contempt of Court; that he was required by an order of Court, to answer questions and make available [fol. 63] 'all originals, etc., during the period between January 1, 1940, up to and including the present time'; that among the persons and entities named by Shamberg in his petition, were listed Conrad Miner, Charles Norris and Homer Race, and the pretended Puritan Church

(Page 16)

Committee to, aid in driving the hoodlums, etc., out of the control of the labor unions, the legal profession, journalism and politics'; that he did do insofar as it was in his power, precisely what was required of him, by the Court order.

"That J. B. Martineau, Jr., a partner of the said law firm of Kirkland, Fleming, Green, Martin and Ellis, had recklessly perjured himself, in the filed petition; that until the order of Judge Harrington of August 21, 1944, had been reversed, there was no order or motion pending in this matter, nor was there any order or motion affecting or regarding either him (Parker, nor the said Puritan Church, nor the Brotherhood of the Ancient Order of St. John, or any of his or their books, records or correspondence:

(Page 17)

"That on October 15, the Puritan Church increased its office space at LaGrange, Illinois; that he (Parker), for 10 years previously had lived at 4534 Greenwood Avenue, Chicago; there were there the usual accumulations of old personal files; that when in October, 1944, he made an arrangement with the Trustees of the Puritan Church to do some work for it, he moved part of his personal files from Chicago to LaGrange and, in the ordinary course of [fol. 64] business, destroyed those which in his opinion

were not worth the cartage expense; that in the destroyed files, there was nothing showing or 'reflecting any dealings' as the motion dated January 2, 1945, required; all were letters from wife, children, friends, like Messrs. Miner, Norris and Race; that destroying in October, the personal effects which he did, he did not violate the said motion of January 2, 1945, to produce material 'showing or reflecting

(Page 18)

any dealings between' him, and Messrs. Race, Norris and Miner; that neither Shamberg nor his counsel have or had any knowledge of the contents of the files destroyed at 4534 Greenwood Avenue, Chicago, in October 1944; that at the time of the destruction of these personal letters, there was no motion, no matter pending, involving said Puritan Church, said Brotherhood of the Ancient Order of St. John; that Judge Trude did not hear the instant matter before November 10, 1944, which date was after the moving of his personal effects from Chicago to LaGrange, and the destruction or abandonment in Chicago, of those not needed by him at LaGrange, Illinois: that just prior to the time when he filed his said Affidavit, in response to the order of the Court, there came into his hands, the document which in accordance with the said order of the Court, he then and there filed, they being all that he then and there had in his possession.

"He denies that he on November 1944, destroyed any books, papers or documents of said Puritan Church and Brotherhood of the Ancient Order of St. John, as alleged by Shamberg in his petition:

[fol. 65] (Page 19)

"In his Affidavit he stated 'all others were destroyed, when this Affiant moved his office last November.' At that time, the Trustees of the Puritan Church, in making room for his personal files, and for the orderly conduct of their business in enlarged quarters, also destroyed books and records which they no longer considered useful at the LaGrange office; these without his help or his suggestion were turned over by the Trustees themselves, to the Janitor of the offices occupied by the Puritan Church at LaGrange, Illinois; that he has never admitted that he has ever destroyed or had anything to do with the destruction

of any of the papers or documents belonging to said Church, or to said Brotherhood.

"He denies that he ever stated under oath, as it is alleged in Shamberg's petition also, under oath, that the Puritan Church, or the Brotherhood of the Ancient Order of St. John have made plans to hang, or murder anyone; he denies that he has ever threatened to commit any crime, let alone, murder.

(Page 20)

On the contrary, he states he has repeatedly maintained that all violators of the Constitution of the U. S. A. deserve the fate of hanging, because of what their destruction of the Constitution means and will mean to other citizens; that all law is down and instead of government there is chaos; and that whatever he has been charged with having written or said contrary to this, is an utter distortion of his meaning, purpose or intent; that the person who swore to Shamberg's petition should be held for perjury.

[fol. 66] (Page 21)

"That there is no proper precedent in law, for the illegal methods which said Shamberg and his counsel have used to inquire into the organization and the workings of a legally organized and existing Church; that Shamberg and his counsel are attempting to establish a dangerous precedent which can be used, if they are successful, against all other existing Churches.

(Page 22)

"That it is wrong and improper to hold him responsible, or attempt to gain from him, the information which he says he does not have; and it is equally improper to charge the Trustees of the Puritan Church, in any matter in which they are not a party, and with which they have no connection.

"That there was no order pending when he destroyed his accumulated personal correspondence; this correspondence was personal and had nothing to do with any matters either properly or improperly before this Court; that they did not concern said Puritan Church, or the said Brotherhood of the Ancient Order of St. John, or any other matters possibly within the pervue of this proceed-

ing; there was no order pending and no reason why such correspondence should not b destroyed; he denies that if such correspondence had been produced that it would have been possible for said Shamberg to have discovered therefrom regarding either

(Page 23)

the present whereabouts of the said Messrs. Race, Miner and Norris, or that their testimony could have been procured; that therefore, he cannot be properly accused of [fol. 67] having knowingly destroyed material evidence in this cause'; That in his Affidavit, he did swear on January 4, 1944 that 'this Affiant never heard of, nor has he ever had any connection with such an organization' which he made in answer to question numbered 23, of said motion which recited 'The pretended Puritan Church Committee' etc., for

(Page 24)

in truth and in fact, there has never been such a Committee; that he answered that question carefully, because he knew that had he answered the question affirmatively, he might have been pilloried and ridiculed in the Chicago Tribune for admitting that he was a member of a 'pretended Committee'; that he has repeatedly under oath maintained that he was Chairman of 'The Committee of the Puritan Church' and had furnished the counsel for Shamberg with a statement, that he was a member of said Committee which exists in fact (Exhibit A); that he was stating the truth when he swore that he was not a member of the 'pretended committee.'

(Page 25)

"That in addition to all that appears herein, he disavows any intention or intent of committing any acts or so conducting himself that may or might be held or determined to be contempt of Court.

(Page 26)

"That from the above it must be patent that he should not be punished for contempt of Court for 'obstructing justice';

(Page 27)

"That he has never admitted destroying any of said records of the Puritan Church or of said Brotherhood of the Ancient Order of St. John.

[fol. 68] Page 28)

"That on December 4, 1944, and on January 2, 1945, the records of the Puritan Church and the Brotherhood of the Ancient Order of St. John were in Canada as he had testified;

(Page 29)

that he has never committed perjury in this proceeding.

(Page 30)

Prayer.

(Page 31)

Signed Harrison Parker.

. . . . . .

Duly sworn to by Harrison Parker, jurat omitted in printing.

[fol. 69] EXHIBIT A

The Puritan Church of the United States of America

(Founded in the American Colonies at Reading,)
Massachusetts in 1642, by Deacon Thomas Parker)

National Headquarters
LaGrange, Illinois

The Puritan Church Committee,
to aid in driving the hoodlums,
the assassins, and the blackmail-
ers out of the control of labor
unions, out of the control of the
legal profession, out of the con-
trol of journalism and out of the
control of politics.

Conrad Miner
Charles Norris
Harrison Parker,
Chairman

Order of Judge Trude, dated January 23, 1945, committing Harrison Parker to the Cook County Jail for 90 days:

ORDER

"This cause coming on to be heard upon the sworn petition of the defendant, Jacob Shamberg, filed by leave of court on January 15, 1945, while the cause of 'Harrison Parker, plaintiff *vs.* Jacob Shamberg, defendant, No. 43-C-13381' was still pending before this court, for an order requiring said Parker to show cause why he shou-d not be punished for criminal contempt of court by reason [fol. 70] of the matters and things in said petition alleged, and upon Harrison Parker's answer thereto filed on January 22, 1945;

"The Court Finds:

"1) The Court has jurisdiction of the parties and of the subject matter hereof;

"2) That on January 15, 1945, a sworn petition was filed on behalf of the defendant, Jacob Shamberg, in the case of 'Harrison Parker, plaintiff *vs.* Jacob Shamberg, defendant, No. 43-C-13381' which sworn petition charged said

Harrison Parker with criminal contempt of court by reason of the matters and things therein alleged;

"3) That on January 15, 1945, an order was entered by this Court, requiring the said Harrison Parker to show cause by Friday, January 19, 1945, which he should not be punished for criminal contempt of court by reason of the matters and things set forth in said petition filed on behalf of said Jacob Shamberg;

"4) That on Thursday, January 18, 1945 an order was entered on the motion of said Parker extending the time within which he was to file his answer to said rule to show cause up to and including ten o'clock A.M., Monday, January 22, 1945;

"5) That on Monday, January 22, 1945 said Parker filed in the office of the Clerk of the Circuit Court of Cook County his 'Answer to Petition for Rule to Show Cause,' a true and photostatic copy of which Answer is attached hereto, incorporated herein, and made a part hereof, and marked 'Exhibit A' hereto;

[fol. 71] "6) That said 'Answer to Petition for Rule to Show Cause,' so filed by said Harrison Parker on January 22, 1945 which answer is attached hereto, incorporated herein, made a part hereof, and marked 'Exhibit A' hereto, does not purge said Parker of the criminal contempt charged in said sworn petition filed on behalf of said Shamberg on January 15, 1945;

"7) That in said 'Answer to Petition for Rule to Show Cause,' so filed by said Parker on January 22, 1945 said Parker has affirmatively set forth scurrilous, scandalous, defamatory, immaterial matter, which constitutes an obstruction of justice and an abuse of the processes of this court, and which conduct of said Harrison Parker took place while this court was in open session and tended to lessen the dignity and authority of this court;

"8) The Court further finds that said Harrison Parker, who is now here present in open Court, is, by reason of said conduct, guilty of direct criminal contempt of this Court;

"Wherefore, The Premises Considered:

"It is ordered and adjudged that said 'Answer to Petition for Rule to Show Cause,' heretofore filed by said Parker in the office of the Clerk of this Court on January 22, 1945, which is attached hereto, incorporated herein,

made a part hereof, and marked 'Exhibit A' hereto, be and the same is hereby attached hereto, incorporated herein, made a part hereof and marked Exhibit A with the same force and effect as if the same were set forth in full in the body of this order; and

[fol. 72] It is further ordered and adjudged that said Rule to Show Cause heretofore issued by this court on January 15, 1945 requiring Harrison Parker to show cause why he should not be punished for contempt of Court by reason of having committed the acts set forth in said petition heretofore filed on behalf of said Jacob Shamberg on January 14, 1945, in the case entitled Harrison Parker, Plaintiff *vs.* Jacob Shamberg, Defendant, No. 43-C-13381, be and the same is hereby made absolute; and

"It is further ordered and adjudged that said Harrison Parker was and is hereby adjudicated guilty of and in direct criminal contempt of this Court by reason of his having affirmatively set forth the scurrilous, scandalous, defamatory and immaterial matters set forth by him in said 'Answer to Petition for Rule to Show Cause,' heretofore filed by said Harrison Parker in the office of the Clerk of this Court on January 22, 1945; and

"It is further ordered and adjudged that said Harrison Parker stand committed to and be confined in the County Jail in said County of Cook and State of Illinois for ninety (90) days; and

"The Court further orders and adjudges that warranty of commitment do now issue in due form for the arrest forthwith of said Harrison Parker, directed to the Sheriff of Cook County, in the State of Illinois, and that when arrested by said sheriff said Harrison Parker be committed to said jail and that he be there held for ninety (90) days or until he shall be otherwise discharged from said imprisonment by due process of law.

Enter:

Daniel P. Trude, Judge.

[fol. 73] Done this 23rd day of January 1945

Bond $1000.00. Mittimus staved until February 2, 1945.

D. P. Trude, Judge."

Attached to this as an exhibit is Answer to Petition for Rule to Show Cause abstracted on page 56 *et seq.* hereof.

AMENDED ORDER

Amended Order of Judge Trude, dated January 23, 1945, committing Harrison Parker to the Cook County Jail for ninety (90) days:

"This cause coming on this day to be heard on the motion of the defendant, Jacob Shamberg, for an order finding the plaintiff, Harrison Parker, guilty of direct contempt of Court by reason of his having filed in the office of the Clerk of the Circuit Court of Cook County, on January 4, 1945, a certain scurrilous affidavit, and on January 15, 1945, a certain scurrilous answer, containing as a part thereof certain false, malicious, scurrilous and defamatory exhibits purporting to be in obstruction of justice and in abuse of the processes of the Circuit Court of Cook County and in manifest pursuance of a scheme to insult, defame, and scandalize the persons, firms and corporations mentioned in said scurrilous affidavit and exhibits thereto, and said scurrilous answer and exhibits thereto, all in disrespect of and in derogation of the authority and dignity of the Circuit Court of Cook County, The Court Finds:

"1) It has jurisdiction of the parties and of the subject matter hereof;

[fol. 74] "2) That on January 4, 1945, said Harrison Parker filed in the office of the Clerk of this Court said scurrilous affidavit, and again on January 15, 1945, said Harrison Parker filed in the office of the Clerk of this Court said scurrilous answer containing as exhibits thereto and as a part thereof a purported 'certified copy of a resolution passed at the joint meeting of the Ecumenical Council of the Puritan Church of the United States and the College of Divines of the Brotherhood of the Ancient Order of St. John, held at the Masonic Temple, 32 W. Randolph Street, on August 16, 1943, and amended at the adjourned meeting held in Chicago on February 5, 1944,' and also a purported copy of a letter on the letterhead of the so-called 'Puritan Church of America,' addressed to 'The Anti-Defamation League, B'Nai B'Rith, 100 No. LaSalle Street, Chicago, Illinois,' and purporting to be signed by 'The Puritan Church, by Harrison Parker, its Chancellor;' and another certain purported copy of a letter on the letterhead of the 'Puritan Church—The Church of America,'

addressed to the 'Honorable Francis Biddle, Attorney General of the United States of America, Washington, D. C.' under date of December 26, 1944, and purporting to be signed 'The Puritan Church, by Harrison Parker, its Chancellor,' which scurrilous affidavit and exhibits thereto, and said scurrilous answer and exhibits thereto, should be by reference incorporated in this order and made a part hereof for greater certainty, and made a part hereof and marked Exhibits 'A' and 'B' respectively.

[fol. 75] "3) That the filing of said scurrilous affidavit and exhibits thereto, and said scurrilous answer and exhibits thereto, by said Harrison Parker constitutes an obstruction of justice and an abuse of the processes of this Court, which conduct of said Harrison Parker took place while this Court was in open session and tended to lessen the dignity and authority of this Court.

"4) The Court further finds that said Harrison Parker, who is now here present in open Court, is, by reason of said conduct guilty of direct contempt of this Court.

"Wherefore, the premises considered:

"It is ordered and adjudged that said scurrilous affidavit filed by said Harrison Parker in the office of the Clerk of this Court on January 4, 1945, and said scurrilous answer filed by said Parker in the office of the Clerk of this Court on January 15, 1945, containing as exhibits thereto 'certified copy of a resolution passed at the joint meeting of the Ecumenical Council of the Puritan Church of the United States and the College of the Divines of the Brotherhood of the Ancient Order of St. John, held at the Masonic Temple, 32 W. Randolph Street, on August 16, 1943, and amended at the adjourned meeting held in Chicago on February 5, 1944' and also a purported copy of a letter on the letterhead of the so-called 'Puritan Church of America,' addressed to 'The Anti-Defamation League, B'Nai B'Rith, 100 N. LaSalle Street, Chicago, Illinois,' and purporting to be signed by 'The Puritan Church, by Harrison Parker, its Chancellor,' and another certain purported copy of a letter on the letterhead of the 'Puritan [fol. 76] Church—The Church of America,' addressed to the 'Honorable Francis Biddle, Attorney General of the United States of America, Washington, D. C.' under date of December 26, 1944, and purporting to be signed 'The

Puritan Church, by Harrison Parker, its Chancellor,' be and the same is hereby incorporated by reference in this order and made a part hereof with the same force and effect as if set forth herein, and marked Exhibit A and B respectively, said scurrilous affidavit filed by said Parker on January 4, 1945, is ordered to be marked Exhibit "A" and said scurrilous answer filed by said Parker on January 15, 1945 is ordered to be marked Exhibit "B."

"It is further ordered and adjudged that said Harrison Parker was and is and hereby is adjudicated guilty of and in direct contempt of this Court; and

"It is further hereby ordered and adjudged that said Harrison Parker stand committed to and be confined in the County Jail in said County of Cook and State of Illinois for Ninety (90) days; and

"The Court further hereby orders and adjudges that a warrant of commitment do now issue in due form for the arrest forthwith of said Harrison Parker, directed to the Sheriff of Cook County, in the State of Illinois, and that when arrested by said Sheriff, said Harrison Parker be committed to said jail and that he be there held for ninety days; or until he shall be otherwise discharged from said imprisonment by due process of law.

Enter:

Daniel P. Trude, Judge.

[fol. 77] Bond $1000.

Mittimus stayed until Feb. 2, 1945
Done this 23rd day of January A.D. 1945.
To the entry of this order plaintiff objects and except.

Daniel P. Trude, Judge."

(Attached to this Amended Order of January 23, 1945, was the affidavit of Harrison Parker abstracted on Page 6 hereof and Exhibits A, B, C, D and E, attached thereto and set forth therein; also the answer of Harrison Parker abstracted on Page 33 hereof, and the Exhibits attached thereto, also herein; and the Answer to the Petition for Rule to Show Cause dated January 22, 1945, abstracted on Page 54 hereof, and the Exhibits attached thereto.)

Order of Judge Trude, to stay issue of mittimus dated February 2, 1945.

Motion of Harrison Parker to stay issue of mittimus, dated February 5, 1945.

Appearance Bond of $2,000 for Harrison Parker, dated January 24, 1945.

Motion of Harrison Parker to vacate Amended Order of Judge Trude of January 15, 1945, dated February 14, 1945.

Order of Supreme Court, dated January 23, 1945, denying writ of error and supesedeas.

Order of Judge Trude denying Motion dated February 14, 1945.

Order of Judge Trude to stay issuance of mittimus, dated February 19, 1945.

Writ of Error.

[fol. 78] Praecipe of Record.

Notice of praecipe for record on appeal.

Notice of Appeal.

Notice of filing Notice of Appeal.

Amended Praecipe for Record.

Notice for Amended Praecipe for Record.

Second Amended Praecipe for Record.

Notice for Second Amended Praecipe for Record.

Certificate of Clerk of Circuit Court.

ASSIGNMENT OF ERRORS

1. The court erred in failing to dismiss the contempt, direct contempt, criminal contempt and direct criminal contempt proceedings herein.

2. The court erred in convicting the plaintiff in error of contempt on the written motion.

3. The court erred in failing to set out facts constituting the offence with particularity and certainty to show that the court was authorized to make the order of contempt.

4. The court erred in failing to find that the motion and petition failed to state facts other than on information and belief, showing the commission of any contempt of the court by the plaintiff in error herein.

5. The court erred in failing to set forth facts upon which the finding of contempt is based and the reviewing court is without knowledge of the precise basis therefor for contempt.

6. The court erred in convicting the plaintiff in error of direct contempt on the written motion.

[fol. 79] 7. The court erred in failing to set out facts constituting the offence with particularity and certainty to show that the court was authorized to make the order of direct contempt.

8. The court erred in failing to find that the motion and petition failed to state facts, other than on information and belief, showing the commission of any direct contempt of the court by the plaintiff in error herein.

9. The court erred in failing to set forth facts upon which the finding of direct contempt is based and the reviewing court is without knowledge of the precise basis therefor for direct contempt.

10. The court erred in again taking jurisdiction and entering an order or amended order after a motion for a writ of error and supersedeas had been denied by the Supreme Court of Illinois.

11. The court erred in entering a rule against the plaintiff in error to show cause why he should not be punished for contempt of court.

12. The court erred in making the rule to show cause against the plaintiff in error, why he should not be punished for contempt of court, absolute.

13. The court erred in convicting the plaintiff in error of criminal contempt on the written motion.

14. The court erred in failing to set out facts constituting the offense with particularity and certainty to show that the court was authorized to make the order of criminal contempt.

15. The court erred in failing to find that the motion and petition failed to state facts, other than on information and belief, showing the commission of any criminal [fol. 80] contempt of the court by the plaintiff in error herein.

16. The court erred in failing to set forth facts upon which the finding of criminal contempt is based and the reviewing court is without knowledge of the precise basis therefor for criminal contempt.

17. The court erred in convicting the plaintiff in error of direct criminal contempt on the written motion.

18. The court erred in failing to s t out facts constituting the offence with particularity and certainty to show that the court was authorized to make the order of direct criminal contempt.

19. The court erred in failing to find that the motion and petition failed to state facts, other than on information and belief, showing the commission of any direct criminal contempt of the court by the plaintiff in error herein.

20. The court erred in failing to set forth facts upon which the finding of direct criminal contempt is based and the reviewing court is without knowledge of the precise basis therefor for direct criminal contempt.

21. The court erred in failing to find that the answers of the plaintiff in error were conclusive and purged him of any and all contempt.

22. The court erred in failing to find that each and every order and the component parts thereof are in conflict with the motions and petitions and facts upon which they purport to be granted.

23. The court erred in failing to find that the component parts of each and every of the orders are in conflict, one with another.

[fol. 81] 24. The court erred in failing to find that the component parts of each and every of the orders are in conflict with the other parts of the orders.

25. The court erred in failing to find that the orders fail to show that they are entered on an information, or affidavit, or rule to show cause, or process of any kind, on other than information and belief.

26. The court erred in failing to find that the orders fail to set forth the precise findings and facts as to the alleged matter that purports to be scurrilous, scandalous, malicious, defamatory and immaterial.

27. The court erred in finding the plaintiff in error guilty of contempt of any kind. The trial court adjudged conduct to be contemptuous which under the law was not and could not have been contempt of court, of any kind.

28. The court erred in failing to find that the orders for contempt, direct contempt, criminal contempt and direct criminal contempt are insufficient for they do not meet that certainty required in proceedings that are criminal or of a criminal nature.

29. The court erred in failing to find that the plaintiff in error was properly in exercise of his rights as a litigant, representing himself *pro se*, and in the exercise of these rights guaranteed to him under and pursuant to the Constitution of the United States of America, and particularly,

Article 6, Fifth Amendment, First Amendment, and the Fourteenth Amendment, and of the Constitution of the State of Illinois, Section 5, Article 2.

[fol. 82] ABSTRACT OF APPELLATE COURT RECORD

Placita.

Praecipe filed February 15, 1945.

Writ of Error dated February 15, 1945.

Scire Facias dated February 15, 1945, served February 21, 1945.

Order staying mittimus, dated February 19, 1945.

Appearance of People of the State of Illinois.

Order March 13, 1945 assigning matter to Second Division.

Order March 13, 1945, allowing motion of Harrison Parker to enter appearance of Arthur Frankel as his attorney.

Order March 20, 1945 allowing motion of Parker to extend time for filing of abstracts and brief.

Order March 20, 1945, denying consolidation of this cause with cause General Number 43373.

Order March 20, 1945, making writ of error a supersedeas, and setting the amount of the bond.

Order March 23, 1945 approving bond.

Order May 1, 1945, taking matter on briefs.

Order May 9, 1945, extended time for briefs and abstracts of Plaintiff in Error.

Order May 31, 1945 giving leave for filing of assignment of errors.

Order June 28, 1945 allowing amendment of record.

[fol. 83] Order August 20, 1945 allowing plaintiff in error extension of time to file motion to strike brief of defendant in error.

Order August 20, 1945, to extend time for filing of reply brief.

Order September 11, 1945 denying motion to strike brief of defendant in error.

Order September 18, 1945, extending time for filing reply brief of plaintiff in error.

Order October 2, 1945, extending time for filing reply brief of plaintiff in error.

JUDGMENT

Judgment order, February 14, 1946; amended judgment order of the circuit court of Cook county entered January 23, 1945, finding Harrison Parker guilty of direct contempt, affirmed. Second judgment order of the circuit court of Cook county entered January 23, 1945, finding Harrison Parker guilty of direct criminal contempt of court, reversed.

Order February 26, 1946, publishing decision in full.

Order February 27, 1946 denying motion of *of* Arthur Frankel to expunge certain pages of the opinion.

Order March 5, 1946 granting leave to appeal.

Order March 26, 1946 denying motion of Arthur Frankel to modify portions of the written opinion.

Writ of Error filed April 1, 1946.

Certificate of Clerk of Appellate Court.

[fol. 84] ASSIGNMENT OF ERRORS

1. The court erred in failing to dismiss the direct contempt proceeding herein.

2. The court erred in convicting the plaintiff in error of contempt on the written motion.

3. The court erred in failing to set out facts constituting the offense with particularity and certainty to show that the court was authorized to make the order of contempt.

4. The court erred in failing to find that the motion and petition failed to state facts other than on information and belief, showing the commission of any contempt of the court by the plaintiff in error herein.

5. The court erred in failing to set forth facts upon which the finding of contempt is based and the reviewing court is without knowledge of the precise basis therefor for contempt.

6. The court erred in convicting the plaintiff in error of direct contempt on the written motion.

7. The court erred in failing to set out facts constituting the offense with particularity and certainty to show that the court was authorized to make the order of direct contempt.

8. The court erred in failing to find that the motion and petition failed to state facts, other than on information and belief, showing the commission of any direct contempt of the court by the plaintiff in error herein.

[fol. 85] 9. The court erred in failing to set forth facts upon which the finding of direct contempt is based and the reviewing court is without knowledge of the precise basis therefor for direct contempt.

10. The court erred in again taking jurisdiction and entering an order or amended order after a motion for a writ of error and supersedeas had been denied by the Supreme Court of Illinois.

11. The court erred in entering a rule against the plaintiff in error to show cause why he should not be punished for contempt of court.

12. The court erred in making the rule to show cause against the plaintiff in error, why he should not be punished for contempt of court, absolute.

13. The court erred in failing to set out facts constituting the offense with particularity and certainty to show that the court was authorized to make the order of direct contempt.

14. The court erred in failing to find that the motion and petition failed to state facts, other than on information and belief, showing the commission of any direct contempt of court by the plaintiff in error herein.

15. The court erred in failing to set forth facts upon which the finding of direct contempt is based and the reviewing court is without knowledge of the precise basis therefor for direct contempt.

16. The court erred in convicting the plaintiff in error of direct contempt on the written motion.

17. The court erred in failing to set out facts constituting the offense with particularity and certainty to show [fol. 86] that the court was authorized to make the order of direct contempt.

18. The court erred in failing to find that the motion and petition failed to state facts, other than on the information and belief, showing the commission of any direct contempt of the court by the plaintiff in error herein.

19. The court erred in failing to set forth facts upon which the finding of direct contempt is based and the re-

viewing court is without knowledge of the precise basis therefor for direct contempt.

20. The court erred in failing to find that the answer of the plaintiff in error was conclusive and purged him of any and all contempt.

21. The court erred in failing to find that each and every order and the component parts thereof are in conflict with the motions and petitions and facts upon which they purport to be granted.

22. The court erred in failing to find that the component parts of each and every of the orders are in conflict, one with another.

23. The court erred in failing to find that the component parts of each and every of the orders are in conflict with other parts of the orders.

24. The court erred in failing to find that the orders fail to show that they are entered on an information, or affidavit, or rule to show cause, or process of any kind, on other than information and belief.

25. The court erred in failing to find that the orders fail to set forth the precise findings and facts as to the [fol. 87] alleged matter that purports to be scurrilous, scandalous, malicious, defamatory and immaterial.

26. The court erred in finding the plaintiff in error guilty of contempt of any kind. The trial court adjudged conduct to be contemptuous which under the law was not and could not have been contempt of court, of any kind.

27. The court erred in failing to find that the order for direct contempt is insufficient for it does not meet that certainty required in proceedings that are of a criminal nature.

28. The court erred in failing to find that the plaintiff in error was properly in exercise of his rights as a litigant, representing himself pro se, and in the exercise of these rights guaranteed to him under and pursuant to the Constitution of the United States of America, and particularly, Article 6, First Amendment, Fifth Amendment, and the Fourteenth Amendment and of the Constitution of the State of Illinois, Section 5, Article 2.

Respectfully submitted, Arthur Frankel, Attorney for Plaintiff in Error.

[fol. 1] IN THE APPELLATE COURT OF ILLINOIS, MAY TERM, A. D. 1946.

PEOPLE OF THE STATE OF ILLINOIS, Defendant in Error,

vs.

HARRISON PARKER, Plaintiff in Error

Error to the Appellate Court of Illinois, First District.

There heard on Writ of Error from the Circuit Court of Cook County.

Honorable Daniel P. Trude, Trial Judge.

ADDITIONAL ABSTRACT OF RECORD—Filed October 17, 1946

PETITION FOR SUBPOENA—Filed March 22, 1944

"Jacob Shamberg, by Kirkland, Fleming, Green, Martin & Ellis, his attorneys, represents unto the court as follows:

1. That this is a suit by Harrison Parker for an alleged slander in which the plaintiff claims the defendant said the following words of and concerning him: "You are a blackmailer."

2. That the defendant in his answer heretofore filed pleads that the statement made by the defendant is true.

[fol. 2] 3. That the "Puritan Church" is registered in the County Recorder's Office of Cook County, Illinois, under document No. 13098659 at Page 223 in Book 1444 as a religious corporation on June 28, 1943. This certificate of incorporation is signed by said Parker as "secretary of the meeting."

4. That the plaintiff, said Parker, has admitted that Dr. Agnes Richardson is the Chancellor of said "Puritan Church." In a deposition heretofore taken it was discovered that one Jesse L. Stewart, one M. S. Johnson and one C. C. Waterbury had been represented as being trustees of said "Puritan Church." Parker has admitted in

his deposition that one Catherine Whalen has been employed by said "Church" to write certain pamphlets and other writings which are distributed by the said "Church." This is a petition for the above persons named to appear for depositions and to bring certain records of the "Puritan Church" with them.

5. These records and testimony of the above named persons are material in this case because:

(a) Your petitioner is informed and believes that Parker formed the so-called "Puritan Church" as a means to carry on certain extortion operations and giving his activities an aura of legality.

(b) Parker has admitted in his deposition that the contributions received by the "Church" were to be used to carry on its campaign to shoot or hang all alleged "constitutional violators."

(c) Parker has testified that a church can say or write anything about any one by virtue of the constitutional provisions as to freedom of religion.

(d) Parker has testified that a church is "legal" as long as it can be shown that it has "solaced one soul."

[fol. 3] (e) Parker has produced letters from people who have purchased so-called religion from the "Puritan Church," most of which enclosed contributions.

(f) In a deposition said Parker has identified over 1100 letters and pamphlets, written, mailed and published to various persons, firms and corporations, containing threats to expose the alleged shortcomings and threats to kill and harm a large number of persons, firms and corporations, including numerous judges and public officials whom Parker has listed as "constitutional violators." Many of said letters have been written by the "Puritan Church" and signed by Parker as a purported officer thereof and are of similar language to those admittedly written by Parker himself.

(g) In a deposition Parker stated "the Puritan Church is going to try to hang ——— and ——— (here he names two prominent citizens) and this Jew ——— (naming a respected judge of the Circuit Court of Cook County) and this Jew ———, (naming a respected judge of the Appellate Court) and

some of the men of the Supreme Court who have written crooked opinions."

7. From the foregoing your petitioner believes that the "Puritan Church" is either in conspiracy with said Parker or is merely a sham designed by said Parker in an attempt to surround his attempted extortions with an odor of sanctity; that the books and records of the "Church" will tend to prove the allegation in the answer that said Parker is a blackmailer.

Wherefore, your petitioner respectfully requests the court for an order permitting him to issue a subpoena duces tecum to the above named persons, Dr. Agnes Richardson, Jesse L. Stewart, M. S. Johnson and C. C. Waterbury; and for them to appear for depositions and to bring with [fol. 4] them all books and records which they have pertaining to the "Puritan Church."

Jacob Shamberg, by Kirkland, Fleming, Green, Martin & Ellis, His Attorneys.

Duly sworn to by J. B. Martineau jurat omitted in printing.

MOTION FOR ORDER TO SHOW CAUSE—Filed January 2, 1945

Now comes the defendant, Jacob Shamberg, by Kirkland, Fleming, Green, Martin & Ellis, his attorneys, and moves the Court as follows:

First: That an order be entered directing the plaintiff, Harrison Parker, to show cause why he should not produce for inspection and to be copied or photographed the following specified documents relating to the merits of the matter in controversy:

[fol. 5] I.

All originals, duplicate originals, and copies of all letters, telegrams, writing memoranda, etc., passing between—and also all minute books, written resolutions, by-laws, trust deeds, contracts, books of account, invoices, receipted bills, cancelled checks, check-stubs, bank statements showing or reflecting any dealings between—and of the following persons, firms, corporations, and pretended religious corporations or bodies,

during the period between January 1, 1940, up to and including the present time:

(1) Jesse L. Stewart,
(2) Jesse L. Stewart Advertising Agency,
(3) M. S. Johnson,
(4) C. C. Waterbury,
(5) L. Holland,
(6) Catherine Whalen,
(7) Agnes Richardson,
(8) "A. Richardson, Chancellor,"
(9) "The Chancellor,"
(10) Elmer Benton,
(11) Conrad Miner,
(12) Charles Norris,
(13) Homer Race,
(14) Maher Printing Company,
(15) Kilgore Linotype Company,
(16) Economy Press,
(17) Buckley-Dement Co.,
(18) Hick & Co.,
(19) LaGrange Trust & Savings Bank,
(20) LaGrange National Bank,
(21) Mercantile National Bank,
(22) "Puritan Church,"
(23) The pretended "Puritan Church Committee to aid in driving the hoodlums, the assassins, and the blackmailers out of the control of labor unions, out of the control of the legal profession, out of the control of journalism, and out of the control of politics,"

[fol. 6] (24) "Puritan Church of the United States";
(25) "Puritan Church of the United States of America";
(26) "Puritan Church of America,"
(27) "Puritan Church—The Church of America,"
(28) "Mother and Father Church of the Puritan Church of LaGrange, Illinois,"
(29) "Mother and Father Church of the Puritan Church of the United States,"
(30) "Mother and Father Church of the Puritan Church of the United States of America,"

(31) "Mother and Father Church of the Puritan Church of America,"

(32) "Brotherhood of the Ancient Order of St. John,"

(33) "Order of Kyria,"

(34) "College of Deacons and Divines" of any and all of the purported bodies described above in sub-paragraphs (22) to (33), inclusive;

(35) "Ecumenical Council" of any and all of the purported bodies described above in sub-paragraphs (22) to (33), inclusive;

(36) "Board of Trustees" of any and all of the purported bodies described above in sub-paragraphs (22) to (33), inclusive;

(37) Harrison Parker, either individually or as pretended "Patriarch," "Ecumenical Patriarch," "Deacon," "Divine," "Chancellor," "Pastor," "Minister," "Moderator," "Ordinator," "Trustee," "Secretary," or member of purported "Ecumenical Council," or purported "College of Deacons and Divines," of any or all of said purported bodies described above in sub-paragraphs (22) to (33), inclusive, or as pretended "Chairman" of the pretended "Puritan Church Committee to aid in driving the hoodlums, the assassins, and the blackmailers out of the control of labor unions, out of the control of the legal profession, out of the control of journalism, and out of the control of politics"; and [fol. 7]

(38) Harrison Parker, doing business under the name and style of "Puritan Church," "The Puritan Church Committee to aid in driving the hoodlums, the assassins, and the blackmailers out of the control of labor unions, out of the control of the legal profession, out of the control of journalism, and out of the control of politics." "Puritan Church of the United States," "Puritan Church of America," "Puritan Church — The Church of America," "Mother and Father Church of the Puri-

tan Church of LaGrange, Illinois," "Mother and Father Church of the Puritan Church of the United States," "Mother and Father Church of the Puritan Church of the United States of America," "Mother and Father Church of the Puritan Church of America," Brotherhood of the Ancient Order of St. John," "Order of Kyria," "College of Deacons and Divines," "Ecumenical Council," "Board of Trustees," "The Patriarch," "The Ecumenical Patriarch," "The Deacon," "The Divine," "The Chancellor," or "The Moderator,"—

and more particularly those records showing or reflecting all activities of any of the persons and bodies described above in sub-paragraphs (6) to (13), inclusive, and (22) to (38), inclusive, in financing, carrying out or threatening, or pretending to carry out, the purposes described above in sub-paragraph (23).

[fol. 8] *Second:* Defendant moves the Court for the entry of an order requiring the plaintiff, Harrison Parker, to state by affidavit whether any of the documents hereinabove described in paragraph I are now or have at any time been in his possession or power, and if not now in his possession or power, when he parted with the same and what has become thereof; and in support of said motion, defendant submits the attached affidavit of J. B. Martineau.

Kirkland, Fleming, Green, Martin & Ellis, Attorneys for Defendant.

STATE OF ILLINOIS, } ss.
COUNTY OF COOK. }

IN THE CIRCUIT COURT OF COOK COUNTY.

Harrison Parker, *Plaintiff*,
vs.
Jacob Shamberg, *Defendant*. } No. 43 C 13381

AFFIDAVIT.

STATE OF ILLINOIS, } ss.
COUNTY OF COOK. }

J. B. Martineau, having first been duly sworn on oath, deposes and says:

That he is a partner of the firm of Kirkland, Fleming, Green, Martin & Ellis, attorneys for the defendant, Jacob Shamberg;

That it is deponent's belief that the plaintiff, Harrison Parker, has now, or at some time has had, in his possession or power the documents described under paragraph I, in the motion attached hereto, and that said documents [fol. 9] relate to the matter in question in the above entitled cause.

J. B. Martineau.

Subscribed and Sworn To before me this 28th day of December, A D. 1944.

Marguerite Alexander,
Notary Public.
(N.S.)

ORDER.

This cause coming on to be heard on defendant's motion in writing, supported by affidavit, for an order requiring the plaintiff, Harrison Parker, to show cause why he should not produce for inspection, and to be copied or photographed, the documents described in said written motion, under Paragraph I, and for an order requiring plaintiff, Harrison Parker, to state by affidavit whether any of said documents are now, or at any time have been, in his possession or power, and if not now in his possesion or power, when he parted with the same and what has become thereof,

and the Court having heard the arguments of counsel and being duly advised in the premises, it is Hereby Ordered:

First, that the plaintiff, Harrison Parker, within four days from the date hereof, show cause why he should not produce for inspection, and to be copied or photographed, the documents described in said written motion;

[fol. 10] And it is Further Ordered:

Second, that the plaintiff, Harrison Parker, within four days from the date hereof, state by affidavit filed in this Court whether any of the documents described in said written motion are now or at any time in the past have been in his possession or power, and if not now in his possession or power, when he parted with the same and what has become thereof.

Enter

DANIEL P. TRUDE,
Judge.

Dated: January 2, 1945.

On January 4, 1945, Parker filed an affidavit in response to the order. Said affidavit, together with the exhibits attached, is set forth as Exhibit A to the amended order of January 23, 1945, at page 18 of the additional abstract.

In response to a motion to hold Parker in contempt of court, Parker, on January 15, 1945, filed an answer which is set forth in Exhibit B to the amended order of January 23, 1945 [additional abstract, p. 50].

On January 15, 1945, the court entered the following order [First Contempt Matter]:

ORDER.

This Cause Coming On This Day To Be Heard on the motion of the defendant, Jacob Shamberg, for an order finding the plaintiff, Harrison Parker, guilty of direct contempt of Court by reason of his having filed in the office [fol. 11] of the Clerk of the Circuit Court of Cook County, on January 4, 1945, and again on January 15, 1945, certain affidavits containing as a part thereof certain false, malicious, scurrilous and defamatory exhibits purporting to be in obstruction of justice and in abuse of the processes of the Circuit Court of Cook County and in manifest pursuance of a scheme to insult, defame, scandalize and black-

mail the persons, firm and corporations mentioned in said scurrilous affidavit and exhibits thereto; all in disrespect of and in derogation of the authority and dignity of the Circuit Court of Cook County;

The Court Finds:

(1) It has jurisdiction of the parties and of the subject matter hereof;

(2) That on January 4, 1945, and again on January 15, 1945, said Harrison Parker filed in the Office of the Clerk of this Court said scurrilous affidavits containing as exhibits thereto and as a part thereof a purported "certified copy of a resolution passed at the joint meeting of the Ecumenical Council of the Puritan Church of the United States and the College of Divines of the Brotherhood of the Ancient Order of St. John, held at the Masonic Temple, 32 W. Randolph Street, on August 16th, 1943, and amended at the adjourned meeting held in Chicago on February 5, 1944", and also a purported copy of a letter on the letterhead of the so-called "Puritan Church of America," addressed to "The Anti-Defamation League, B'Nai B'Rith, 100 N. La Salle Street, Chicago, Illinois," and purporting to be signed by "The Puritan Church, by Harrison [fol. 12] Parker, its Chancellor"; and another certain purported copy of a letter on the letterhead of the "Puritan Church—The Church of America", addressed to the Honorable Francis Biddle, Attorney General of the United States of America, Washington, D. C.", under date of December 26, 1944, and purporting to be signed "The Puritan Church, by Harrison Parker, its Chancellor", which scurrilous affidavit and exhibits thereto should be by reference incorporated in this order and made a part hereof for greater certainty;

(3) That the filing of said scurrilous affidavits and exhibits thereto by said Harrison Parker constitutes an obstruction of justice and an abuse of the processes of this Court, which conduct of said Harrison Parker took place while this court was in open session and tended to lessen the dignity and authority of this Court;

(4) The Court further finds that said Harrison Parker, who is now here present in open court, is, by reason of said conduct guilty of direct contempt of this Court.

Wherefore, the premises considered:

It Is Ordered And Adjudged, that said scurrilous affidavits filed by said Harrison Parker in the office of the Clerk of this Court on January 4, 1945, and again on January 15, 1945, and containing as exhibits thereto "certified copy of a resolution passed at the joint meeting of the Ecumenical Council of the Puritan Church of the United States and the College of Divines of the Brotherhood of the Ancient Order of St. John, held at the Masonic Temple, 32 W. Randolph Street, on August 16th, 1943, and amended [fol. 13] at the adjourned meeting held in Chicago on February 5, 1944", and also a purported copy of a letter on the letterhead of the so-called "Puritan Church of America", addressed to "The Anti-Defamation League, B'Nai B'Rith, 100 N. La Salle Street, Chicago, Illinois", and purporting to be signed by "The Puritan Church, by Harrison Parker, its Chancellor"; and another certain purported copy of a letter on the letterhead of the "Puritan Church—The Church of America", addressed to the "Honorable Francis Biddle, Attorney General of the United States of America, Washington, D. C.", under date of December 26, 1944, and purporting to be signed "The Puritan Church, by Harrison Parker, its Chancellor", be and the same is hereby incorporated by reference in this order and made a part hereof with the same force and effect as if set forth herein; and

It Is Further Ordered And Adjudged that said Harrison Parker was and is and hereby is adjudicated guilty of and in direct contempt of this Court; and

It Is Further Hereby Ordered and Adjudged that said Harrison Parker stand committed to and be confined in the County Jail in said County of Cook and State of Illinois for ninety days.

The Court Further Hereby Orders and Adjudges that a warrant of commitment do now issue in due form for the arrest forthwith of said Harrison Parker, directed to the Sheriff of Cook County, in the State of Illinois, and that when arrested by said Sheriff said Harrison Parker be committed to said jail and that he be there held for

ninety days or until he shall be otherwise discharged [fol. 14] from said imprisonment by due process of law.

Enter:

DANIEL P. TRUDE,
Judge.

Done this 15th day of January 1945.

On January 23, 1945, the following amended order was entered [First Contempt Matter]:

STATE OF ILLINOIS, } ss.
COUNTY OF COOK. }

IN THE CIRCUIT COURT OF COOK COUNTY.

Harrison Parker,
Plaintiff,
vs.
Jacob Shamberg,
Defendant.
People of the State of Illinois,
vs.
Harrison Parker.

No. 43 C 13381

AMENDED ORDER—JAN. 23, 1945.

This cause coming on this day to be heard on the motion of the defendant, Jacob Shamberg, for an order finding the plaintiff, Harrison Parker, guilty of direct contempt of Court by reason of his having filed in the office of the Clerk of the Circuit Court of Cook County, on January 4, 1945, a certain scurrilous affidavit, and on January 15, 1945, a certain scurrilous answer, containing as a part thereof certain false, malicious, scurrilous and defamatory exhibits purporting to be in obstruction of justice and in abuse of the processes of the Circuit Court of Cook [fol. 15] County and in manifest pursuance of a scheme to insult, defame, and scandalize the persons, firms and corporations mentioned in said scurrilous affidavit and exhibits thereto, and said scurrilous answer and exhibits thereto, all in disrespect of and in derogation of the authority and dignity of the Circuit Court of Cook County, THE COURT FINDS:

(1) It has jurisdiction of the parties and of the subject matter hereof;

(2) That on January 4, 1945, said Harrison Parker filed in the office of the Clerk of this Court said scurrilous affidavit, and again on January 15, 1945, said Harrison Parker filed in the office of the Clerk of this Court said scurrilous answer containing as exhibits thereto and as a part thereof a purported "certified copy of a resolution passed at the joint meeting of the Ecumenical Council of the Puritan Church of the United States and the College of Divines of the Brotherhood of the Ancient Order of St. John, held at the Masonic Temple, 32 W. Randolph Street, on August 16, 1943, and amended at the adjourned meeting held in Chicago on February 5, 1944," and also a purported copy of a letter on the letterhead of the so-called "Puritan Church of America," addressed to "The Anti-Defamation League, B'Nai B'Rith, 100 N. La Salle Street, Chicago, Illinois," and purporting to be signed by "The Puritan Church, by Harrison Parker, its Chancellor"; and another certain purported copy of a letter on the letterhead of the "Puritan Church—The Church of America," addressed to the "Honorable Francis Biddle, Attorney General of the United States of America, Washington, D. C.," under date [fol. 16] of December 26, 1944, and purporting to be signed "The Puritan Church, by Harrison Parker, its Chancellor," which scurrilous affidavit and exhibits thereto, and said scurrilous answer and exhibits thereto, should be by reference incorporated in this order and made a part hereof for greater certainty, and made a part hereof and marked Exhibits "A" and "B" respectively.

(3) That the filing of said scurrilous affidavit and exhibits thereto, and said scurrilous answer and exhibits thereto, by said Harrison Parker constitutes an obstruction of justice and an abuse of the processes of this Court; which conduct of said Harrison Parker took place while this Court was in open session and tended to lessen the dignity and authority of this Court;

(4) The Court further finds that said Harrison Parker, who is now here present in open Court, is, by reason of said conduct guilty of direct contempt of this Court.

Wherefore, the premises considered:

It Is Ordered And Adjudged that said scurrilous affidavit filed by said Harrison Parker in the office of the Clerk of this Court on January 4, 1945, and said scurrilous answer

filed by said Parker in the office of the Clerk of this Court on January 15, 1945, containing as exhibits thereto "certified copy of a resolution passed at the joint meeting of the Ecumenical Council of the Puritan Church of the United States and the College of Divines of the Brotherhood of the Ancient Order of St. John, held at the Masonic Temple, 32 W. Randolph Street, on August 16, 1943, and amended at the adjourned meeting held in Chicago on [fol. 17] February 5, 1944," and also a purported copy of a letter on the letterhead of the so-called "Puritan Church of America," addressed to "The Anti-Defamation League, B'Nai B'Rith, 100 N. LaSalle Street, Chicago, Illinois," and purporting to be signed by "The Puritan Church, by Harrison Parker, its Chancellor," and another certain purported copy of a letter on the letterhead of the "Puritan Church—The Church of America," addressed to the "Honorable Francis Biddle, Attorney General of the United States of America, Washington, D. C." under date of December 26, 1944, and purporting to be signed "The Puritan Church, by Harrison Parker, its Chancellor," be and the same are hereby incorporated by reference in this order and made a part hereof with the same force and effect as if set forth herein, and marked Exhibits "A" and "B" respectively, said scurrilous affidavit filed by said Parker on January 14, 1945, is ordered to be marked Exhibit "A" and said scurrilous answer filed by said Parker on January 15, 1945, is ordered to be marked Exhibit "B".

It Is Further Ordered And Adjudged that said Harrison Parker was and is and hereby is adjudicated guilty of and in direct contempt of this Court; and

It Is Further Hereby Ordered And Adjudged that said Harrison Parker stand committed to and be confined in the County Jail in said County of Cook and State of Illinois for Ninety (90) Days; and

The Court Further Hereby Orders And Adjudges that a warrant of commitment do now issue in due form for the arrest forthwith of said Harrison Parker, directed [fol. 18] to the Sheriff of Cook County, in the State of Illinois, and that when arrested by said Sheriff, said Harrison Parker be committed to said jail and that he be there held for ninety days (90) ....., or until he shall

be otherwise discharged from said imprisonment by due process of law.

ENTER:

DANIEL P. TRUDE,
Judge.

Done this 23d day of January, A. D. 1945.
Bond $1,000.
Mittimus stayed until February 2, 1945.
To the entry of the order plaintiff objects and excepts.

DANIEL P. TRUDE,
Judge.

EXHIBIT "A" TO AMENDED ORDER OF JANUARY 23, 1945

STATE OF ILLINOIS, } ss.
COUNTY OF COOK. }

IN THE CIRCUIT COURT OF COOK COUNTY.

Harrison Parker, *Plaintiff.*
vs.
Jacob Shamberg, *Defendant.*
No. 43 C 13381

AFFIDAVIT.

Harrison Parker, having first been duly sworn on oath, deposes and says:

Answering questions numbered on the defendant's motion dated December 28, 1944, one, two, three, four, five, [fol. 19] six, seven, eight, nine, ten, fourteen, fifteen, sixteen, seventeen, eighteen, nineteen, twenty, twenty-one, twenty-six, twenty-nine, thirty, thirty-one, this affiant has not now, nor has he ever had in his possesion, power, custody, or control, nor has he ever seen any originals, duplicate originals, and copies of any or all letters, telegrams, writings, memoranda, etc., passing between and also all minutes books, written resolutions, by-laws, trust deeds, contracts, books of account, invoices, receipted bills, cancelled checks, check stubs, bank statements, showing or reflecting any dealings between any of the following persons, firms, corporations, and pretended religious corporations or bodies during the period between January 1, 1940 up to and including the present time:

Answering questions eleven, twelve and thirteen, this affiant, in November, 1944, when he moved his private

files from 4534 Greenwood Avenue, Chicago, destroyed all his correspondence with Messrs. Miner, Norris and Race, along with a lot of other useless and unimportant to him, letters, records, etc.

Answering questions twenty-two, twenty-four, twenty-five and twenty-seven and twenty-eight, this affiant had the original articles of incorporation and their by-laws in his possession some time during 1940 or 1941; these he left with Harris F. Williams, 230 S. Clark Street, Chicago, where they were held, until they were called for and delivered to Mr. Conrad Miner.

Answering question thirty-three, this affiant received the original articles of incorporation and the by-laws from Harris F. Williams and delivered them to Dr. Agnes Richardson of Berwyn, Illinois;

[fol. 20] Answering question Thirty-two, this affiant had them in his possession at one time and delivered them to Mr. Conrad Miner;

Answering questions thirty-four, thirty-five, thirty-six and thirty-seven, this affiant attaches herewith as exhibits A, B, C, and D, all of the requested documents now in his possession, custody, power or control; all others were destroyed when this affiant moved his office, last November;

Answering question numbered thirty-eight, this affiant never did, at any time, under any circumstances, do business "under the name and style of Puritan Church," "The Puritan Church Committee, etc., to Moderator;"

Answering question twenty-three, this affiant never heard of, nor has he ever had, any connection with such an organization;

Answering question numbered Thirty-seven, this affiant attaches herewith all the requested documents which he has at present in his possession, power, custody, or control, with any of the persons, firms, or incorporations numbered 1 to 38.

Harrison Parker.

Subscribed and sworn to before me this 4th day of January, A. D. 1945.

Leah Gonsolin,
Notary Public.

(Seal)

[fol. 21] ATTACHED TO AND MADE A PART OF PARKER'S AFFIDAVIT OF JANUARY 4, 1945.

CERTIFIED COPY OF A RESOLUTION PASSED AT THE JOINT MEETING OF THE ECUMENICAL COUNCIL OF THE PURITAN CHURCH OF THE UNITED STATES AND THE COLLEGE OF DIVINES OF THE BROTHERHOOD OF THE ANCIENT ORDER OF ST. JOHN, HELD AT THE MASONIC TEMPLE, 32 W. RANDOLPH STREET, ON AUGUST 16TH, 1943 AND AMENDED AT THE ADJOURNED MEETING HELD IN CHICAGO ON FEBRUARY 5, 1944.

Whereas, the direct sires of the present members of this Puritan Church fled England to escape the tyranny of government by man, and braved the dangers of the sea, of an unknown forest, a wilderness and the aboriginal Indian, to dwell as free men on American soil;

And Whereas, the direct sires of the present members of this Puritan Church fought and bled at Concord, Bunker Hill, and died at Valley Forge, to establish on the same soil, a government by law, instead of by man;

And Whereas, the constitution of the government thus set up by the Puritans, protects the laboring man in the possession of his cottage, and the millionaire in his palace, the Jew, the Catholic, the Protestant and the Puritan in the worship of God;

And Whereas, this established government invited the peace-loving, the home-loving, the industrious, and the law abiding of the earth, to emigrate to it, and share with the Puritans, the blessings and the happiness that flows from the living under such a government;

And Whereas, along with the peace-loving, the home-loving, industrious and the law abiding, there came to [fol. 22] the hospitable but unprotected shores of this orderly government, a lot of scoundrels, rascals, black legs, riff-raff, and the dregs of the outpouring of the cellars of the earth;

And Whereas, Joseph Medill, an Irish emigrant, arrived in the U.S.A. along with this mixed crowd in the steerage;

And Whereas, as soon thereafter as it was possible, after he had been fumigated and deloused at Ellis Island, this Joseph Medill set up a corporately owned newspaper called the Chicago Tribune, whose money making policy was:

(1) to make circulation by being, in its news and editorial columns, "Agin" the government in power, with libels of its leaders; (2) to make cash dividends by blackmailing the elected public officials to allow it to steal money from the County which protected it in its infamy;

And Whereas, the public records of Cook County show that the Chicago Tribune, under the management of the said Joseph Medill, cheated the law abiding citizens of Cook County of the approximate sum of 15 million dollars, by a cunning and hidden violation of the Constitution of Illinois, by defying the law passed by her legislature and by bribing the elected public officials and the courts;

And Whereas, the stock control of this Chicago Tribune, passed by inheritance, to Eleanor Medill Patterson, and Katherine Medill McCormick, the only living children of said Joseph Medill;

And Whereas, these two women allowed the Chicago Tribune to continue the cowardly and dishonorable policy of their father, whereby another approximately 20 million dollars was stolen by the Chicago Tribune from the unsus- [fol. 23] pecting and docile citizens of Cook County, by the use of the same money stealing scheme that was original with their cunning father;

And Whereas, these two women, Eleanor Medill Patterson and Katherine Medill McCormick, were each detected, tried and convicted and penalized by the United States Government, for withholding from that government an enormous sum of money due to it, as Income Taxes. (The scheme the women used was set up for them, in Weymouth Kirkland's crooked law office; its other tax clients, Moe Annenberg, and other scoundrels had to do long "stretches" in Leavenworth Prison for using similar schemes.)

And Whereas, the stock control of the Chicago Tribune descended again by inheritance from these two women, to Joseph Medill's grandchildren, Robert R. McCormick, the so-called Editor of the Chicago Tribune and Joseph Medill Patterson the Editor of the New York Daily News, and Eleanor Schlesinger, the so-called Editor of the Washington, D. C. Herald;

And Whereas, it is shown and proven in the public records of Illinois that the said Robert R. McCormick is a coward, a liar, a cheat, a thief, a court-fixer, a free-lover, a constitution violator, an all-around scoundrel, whose

private fortune of an acknowledged 16 million dollars, has been accumulated by defrauding the government that protects him, and his fellowman through "phoney" corporations and other schemes devised and set up for him, in the office of the crooked law firm of Kirkland, Fleming, Green, Martin and Ellis, at 33 N. LaSalle Street, Chicago; [fol. 24] And Whereas, the public records show that the said Joseph Medill Patterson kicked out of his life in her old age, the wife ~~of his youth~~ and the mother of his legitimate children, and set up in her place, and in the place of their legitimate children, his more youthful female stenographer, and their son;

And Whereas, the long suppressed but certified records of Cook County show that the Chicago Tribune, under the management of said grandsons of the said Joseph Medill, has stolen from the law-abiding citizens of Cook County more money than was stolen from them, during the combined administration of their grandfather and mothers, and by the use of the same dishonorable scheme;

And Whereas, the public records show that the said Robert R. McCormick has either influenced, intimidated or bribed a United States Court Judge of Chicago, in Case No. 22619, to issue a crooked order which enabled him to enter his best friend's home, to steal his wife and break up his friend's home;

And Whereas, the same public records show that the said Robert R. McCormick either influenced, intimidated or bribed Circuit Court Judges Harry M. Fisher and Joseph Burke, in Case No. 38C-3209, to issue crooked orders in a vain attempt to hide the fact, that the Chicago Tribune, under its management by the Medill-McCormick Patterson families, has stolen the approximate sum of 100 million dollars from Cook County.

(An order by these judges based on the established law of Illinois would have forced the Chicago Tribune to trial; with the facts as they are, and the law as it is, the Chicago Tribune dare not go to trial; it would be [fol. 25] compelled to disgorge all the stolen money; so it either influenced, intimidated or bribed these faithless judges to issue crooked orders by which a trial was prevented.)

And Whereas, the same public records show that the said Robert R. McCormick either influenced, intimidated or bribed Justices Stone, Gunn and Wilson, still sitting on the Supreme Court of Illinois, to write in Case 24881, an opinion more crooked than any ever written by Judge Manton of Atlanta Prison, by which Cook County's legal orderly lawsuit to compel the Chicago Tribune to disgorge millions of dollars it has stolen from Cook County, was temporarily obstructed;

(An order by the Illinois Supreme Court, based on the established law of Illinois would have forced the Chicago Tribune to trial; with the facts as they are, and the law as it is, the Chicago Tribune dare not go to trial; it would be compelled to disgorge all the stolen money; so it either influenced, intimidated or bribed these faithless judges on the Supreme Court of Illinois to issue crooked orders by which a trial was prevented.)

And Whereas, the public records show that said Robert R. McCormick either influenced, intimidated or bribed the entire division of the Appellate Court of Chicago, presided over by Judge Hugo Friend, to write a crooked opinion in Case No. 39804, in litigation in which McCormick and his Weymouth Kirkland had a large money interest in a crooked opinion.

(An opinion of the Appellate Court based on the established law of Illinois would have compelled Kirkland to [fol. 26] go to trial in a matter in which $100,000 was involved; Kirkland dared not go to trial; so he and McCormick either influenced, intimidated or bribed this faithless judge to issue a crooked opinion by which the trial of Kirkland was prevented; thus this cowardly Kirkland was protected, and the honest litigant against Kirkland was outraged and despoiled by the crooked opinion of a crooked judge.)

And Whereas, the public records show that said Robert R. McCormick either influenced, intimidated or bribed Judges Joseph A. Sabath and John Prystalski, of the Criminal Court of Cook County, in Cases 20981 and A40, to "railroad" to Joliet Prison and to the Cook County Jail, for the benefit of this unconscionable scoundrel McCormick, men whom the Supreme Court of Illinois records in Cases 20981 and 25595 show to be innocent of the charges for which they were "railroaded."

And Whereas, by reason of the corruption by said McCormick and his crooked lawyers, of all the Courts of Illinois, from Eugene McGarry's Municipal Court up to and including Francis Wilson's crooked Supreme Court of Illinois, the combined money fortunes of the Medill-McCormick-Patterson family, now amounts to the dangerous figure of 125 million dollars;

And Whereas, this swollen and dishonestly gained money fortune started by the penniless and ungrateful emigrant, Joseph Medill, has descended to the third generation without the payment of a single cent of any of the legally imposed taxes, except a small one paid on the estate of Eleanor Medill Patterson; (The other sister, Katherine Medill McCormick died one of the richest persons who have [fol. 27] died in Chicago during the last 30 years). She was born, wed and buried in Chicago. All her children were born in Chicago. Her father before her had lived for 50 years in Chicago. At his death, the family home in Wheaton, where Robert R. McCormick now resides, became her home. A frequent world traveller, she died sojourning in Paris, France. Her body was returned to Chicago and deposited in the Medill family plot in Rosehill Cemetery.

Before she left for her last visit to France, Mrs. McCormick made a new will. Weymouth Kirkland wrote it for her. In it she clearly stated that she was a resident of the City of Chicago; she was proud of it. Before her departure for France, she wrote to the Collector of Internal Revenue for the United States with whom she had large money transactions, a letter in which she officially gave him her address as Chicago.

When her will was offered for probate as it was in the Probate Court of Cook County, there was due from her estate to the State of Illinois, an enormous inheritance tax. Robert R. McCormick was the executor of the will and one of the principal beneficiaries of this enormously rich estate.

Robert R. McCormick, who had been taught with his mother's milk to cheat and defraud whenever he could, determined to swindle the State of Illinois of that inheritance tax. A politician, Harry B. Ash, "supported" for office by the Chicago Tribune, was in charge of the inheritance tax division of the office of the Attorney General of Illinois.

[fol. 28] Robert R. McCormick, quietly with no "publicity," appeared before that faithless politician, arose on the witness stand, took an oath to his God to tell the truth and then lied like a horse thief; he swore that his mother, Katherine Medill McCormick was not a resident of the State of Illinois. McCormick was followed on the witness stand by the four-times indicted Weymouth Kirkland. He also took the oath to his God to tell the truth; then, with a straight face, he, too, swore that Katherine Medill McCormick was not a resident of the State of Illinois. To curry favor with the degenerate son of a dead and defenseless client, Weymouth Kirkland, a lawyer, thus repudiated a mandate in a will which a client for reasons of her own, had paid him a large fee to insert in it.

The politician, Harry B. Ash, upon the self-serving testimony of these two dressed-up, pink-scented scoundrels, decided that Katherine Medill McCormick was not a resident of the State of Illinois. By that one man decision, the State of Illinois was robbed of an enormous sum of money due to it, and Robert R. McCormick and his crooked lawyer, Weymouth Kirkland, were correspondingly enriched.

But, the established law of Illinois is that residence is purely a matter of intent; there is no other law. Katherine Medill McCormick, having expressed in writing, in her last will, that she was a resident of the State of Illinois, the decision of Ash to the contrary is void. The estate of Katherine Medill McCormick still owes the State of Illinois the money due to it for the inheritance from that enormous estate; it can be collected; it will be collected [fol. 29] with interest; fraud is never outlawed in Illinois, even when committed by Robert R. McCormick and Weymouth Kirkland, as it was in this infamous transaction with the State that protects them and their vast property.

The facts and the evidence of the Chicago Tribune's 100 million dollar steal from Cook County and Robert R. McCormick and Weymouth Kirkland's pollution of the entire court system of Illinois, in a vain effort to hide their crimes, is even worse than it is in the above summary of the evidence, dug from actual public records.

For years, all the deacons and nearly all the members of the Puritan Church believed that the Chicago Tribune was the palladium of their liberties. Recently, by an Act

of God, there was revealed to this Church, evidence from the private papers of the Medill family, that since the year 1873, while the Chicago Tribune was hypocritically shouting that it was a free press watching the "interests of the public," it was robbing Cook County of a sum of money which now amounts to approximately 100 million dollars. Every dollar of stolen money has been traced into the private bank accounts of Robert R. McCormick, the editor of the Chicago Tribune, Joseph Medill Patterson, editor of the New York Daily News, and Mrs. Eleanor Patterson Schlesinger, the editor of the Washington D. C. Herald, and into the bank accounts of the other stockholders of the Tribune, who have become millionaires by reason of the Chicago Tribune's enormous money thefts from Cook County.

[fol. 30] Before making public the cowardly crimes and the constitutional violations which the evidence reveals were committed by Robert R. McCormick, the Puritan Church submitted the evidence to the best legal authorities. All pronounced the evidence to be irrefragable; all say that for committing the crimes he has, particularly fixing crooked judges to write crooked opinions, Robert R. McCormick should be either incarcerated in an insane asylum or taken out by a posse of indignant and robbed fellow citizens, and either shot or hanged to an oak tree, as was done in Illinois when horse stealing instead of stealing money from the County was the principal occupation of gentry of the ilk of Robert R. McCormick.

His grandfather, Joseph Medill, was a typical product of the "Tragic Era" during which he lived. Base, ignorant, and selfish by nature, cunning, hypocritical and greedy by training, the midnight steal of the lease on the property of the school children of Chicago, by which the school children were deprived of penny lunches, and the Medill Family enormously enriched by the fraud, was the outstanding event of his selfish career. This deal was put through the School Board by A. S. Trude, the general counsel for the Chicago Tribune and also at the same time the president of the School Board. In 1925, the Chicago Tribune sold this lease for a profit of $6,040,000 cash, according to its own books.

A multi-millionaire at his death, Joseph Medill died, not leaving to Chicago even a book for its public library, or

a plant for its public parks. His daughter, Katherine Medill McCormick, was a "chip off the old block." Ignorant, penurious, crass and materially ambitious, her [fol. 31] enormous expected money inheritance from her father enabled her to marry into a socially prominent Chicago family. The influence of the Chicago Tribune and the socially prominent husband whose bills she grudgingly paid, permitted her to live in the capitols of Europe, where she could "rub noses" with "royalty," and laud it over them with her American dollars.

Her son, Robert R. McCormick, was also "a chip off the old block." He was practically brought up by cheap servants, while his mother was gadding about Europe. But he had the advantage of good schools and Yale University. There is no defense like ignorance, which his grandfather and mother had, to the crimes against his state and his fellow man, which the evidence in the possession of the Puritan Church reveals he committed, except that he is, also, insane. His only brother, Medill McCormick, was pronounced incurably insane by the celebrated alienists, Patrick, Worthy and Jung. A raving maniac, Medill McCormick had to be taken in his pajamas off a New York Central train at Syracuse and held there, in a common jail, in a padded cell, until he could be soothed. Later, he died in Washington, D. C., under circumstances in which raving maniacs usually die.

The "What a Man" letter written by McCormick; his statement that the U. S. War Department consulted him about the defense of Detroit against a friendly nation; his antics at social gatherings that he might be considered the "life of the party"; his insistence that he be given the "seat of honor" at banquets, and be permitted to speak on the subject of the evening, whether or not he [fol. 32] or his "ghost writers" know anything about the subject; the "railroads" of innocent men to prison in which he has engaged; the cowardly crimes he had wantonly committed, in order to make himself a muti-millionaire; his insistence that the Police Department of Chicago ride him home in one of the department's "Squad Cars" at the public's expense; his law-suits with his farm neighbors about trifling money matters; his attempt to "welch" on a debt of honor; his employment and close association with professional murderers, like Jack Gentleman, Mossy

Enright, Gyp the Blood, Philadelphia Jack Barry, and other hoodlums and anonymous letter writers, like Al Capone and Jake Lingle, indicate that there might be a screw loose in the mental machinery of Robert McCormick, as the celebrated alienists found there was in that of other members of his immediate family.

His position as the head and control of an important newspaper which he occupies by an accident of birth; his known hatred for the Jews, the Puritans and the Negroes; his means for inciting other men against them; (he employs that self-confessed news fakir, J. Loy Maloney, as the managing editor of the Chicago Tribune) his insistence that he be the political "Boss" of Illinois, and the head of the Republican Party in the U. S.; his demands that he be permitted to run an important war on two fronts, even when his ideas are counter to those of the same West Point trained military officers of the U. S. Army; his control of over 100 million dollars with the right in his obvious mental condition, to spend it as he chooses, even to [fol. 33] the destruction of our government, compels the Puritan Church in its duty to its otherwise defenseless congregation, and to its neighboring defenseless congregations, to proceed in view of the fear of public officials of the blackmailing Chicago Tribune, to the criminal prosecution of this man, if he be sane, or his incarceration in a suitable institution, under guard, if he be insane. No orderly society can endure, in which a man who is either a criminal or insane, insists upon the leadership of it by his inherited control of a privately owned money-making corporation called a newspaper.)

And Whereas, the public records show that all the Judges who issued the obviously crooked orders and opinions for McCormick, his newspaper and his crooked law firm, were unqualifiedly advocated and re-elected by the "support" and endorsement of the Chicago Tribune, to places on the Circuit and Superior Courts of Cook County, and to the Appellate and Supreme Courts of Illinois, where they now sit passing judgment on the lives and property of defenseless men and women who have no way in the law of Illinois, to protect themselves against the depravities which such scoundrels will commit under the cover of a court order and opinions;

And Whereas, the said McCormick has already started

atrocities on the Jews, the Negroes and the Puritans, by having one of his crooked judges write a crooked opinion under which a Puritan was "railroaded" to the Cook County Jail and held there, while unspeakable atrocities were inflicted upon him there by Howard Ellis of the Notorious law firm of Kirkland, Fleming, Green, Martin [fol. 34] and Ellis, the lawyers for McCormick in all his cowardly "railroads" of innocent men, and his thieving operations to increase his private fortune;

And Whereas, Dwight H. Green, McCormick's Governor of Illinois, by the orders of the same McCormick, has and is violating Article 5 of Section 6 of the Constitution of Illinois;

And Whereas, one Werner Schroder, McCormick's member from Illinois of the Republican National Committee, walks in and out of the back doors of the chambers of the crooked judges of the Supreme Court of Illinois, to make political deals for them and with them, and for the said Robert R. McCormick;

And Whereas, neither life, nor property nor reputation, neither the Jew, Negro or the Puritan is safe, when the Constitution of Illinois is violated, its law defied, its courts corrupted, and the elected state officials from the Governor of the State down to the policeman on his beat, who allows the "bookies" to operate, are under the domination of a man whose public record is that he is a liar, a cheat, a thief, a court-fixer, a constitution violator, a free-lover, and an all-around scoundrel, and a white-livered coward;

And Whereas, the courts of Illinois are unable to cope with the power of this corporately owned newspaper; to withstand its threats, its bribery and its blackmail; its interference in the nomination and election of judges by control of ward committeemen and county organizations, and its praise for judges who obey the orders of its McCormick, no matter how corrupt such judges may be, and by its assaults upon and abuse of honest judges, who refuse to carry out such orders, is creating a situation [fol. 35] where the courts of Illinois are not open to the citizens of Illinois;

And Whereas, the constitution of the United States provides that no citizen shall be deprived of life, liberty or property without due process, when as a matter of fact,

due to the corrupt power wielded by the said McCormick and his privately owned Tribune, citizens of Illinois have been and are denied due process of law and equal application in all cases in which the said McCormick and his newspaper or his lawyers are a partisan or interested, and the State of Illinois is denied the republican form of government guaranteed to it by the United States Constitution;

And Whereas, by reason of the power of the said McCormick and his Tribune, and their corrupt use of money, their power to frighten and intimidate public officers of said State of Illinois, including the Governor, its Legislature, and its Supreme Court, it is impossible for citizens of Illinois to have the help of such public officers in bringing said McCormick and the said Tribune before any court where complaints against them will be given a fair trial.

Now, Therefore, Be it Resolved, and it is Hereby Resolved, that the Federal Government at Washington, D. C., be petitioned and it is hereby petitioned under the first and fourteenth amendments to the Constitution of the United States of America, to:

1. Convene a Federal Grand Jury to investigate the evidence under which each and every charge in this petition is brought; if it be true that the civil liberties of Nationals living in Illinois have been invaded by the scoundrelism [fol. 36] that is rampant in Illinois, then,

2. Place Illinois, by the war powers conferred upon our President, Franklin Delano Roosevelt, under military rule;

3. Convene a military court, and under the rules of such a court try for the crimes which they are charged with having committed against the civil liberties of the Nationals who are compelled to dwell in Illinois, the following men: Robert R. McCormick, Joseph Medill Patterson, Weymouth Kirkland, Judges Harry M. Fisher, Joseph Burke, John Prystalski, Hugo Friend, Joseph A. Sabath, and Justices Wilson, Gunn and Stone of the Supreme Court of Illinois. If found guilty, they should be taken out either by soldiers or a posse of civilians and shot, as a warning to other scoundrels, that our Federal Government will not tolerate the violation of a State Constitution, and the "railroad" to prison or jail of innocent men by the order of crooked judges in the hire of this scoundrel, McCormick;

4. Collect from Robert R. McCormick with interest, every cent of the inheritance tax due to the State of Illinois from the estate of Katherine Medill McCormick;

5. Collect from the Chicago Tribune with interest, every cent it has stolen from Cook County;

6. Call a Constitutional Convention in Illinois, to make a new constitution which in the future will prevent thieves from obtaining the control of a newspaper and using it to blackmail fortunes for its stockholders.

7. Re-establish in Illinois the republican form of government guaranteed to every state by the Constitution of the [fol. 37] U.S.A., which has been destroyed in Illinois, by the illegal and unconstitutional operations of the Chicago Tribune, McCormick, Kirkland, Patterson and their crooked judges.

And, Be it Resolved, and it is Resolved, that a Committee consisting of Conrad Miner, Charles Norris and Harrison Parker be, and they are hereby appointed to deliver this petition of our grievances to the proper United States Government authorities, and to do such other things as may be needed to prevent government of the people, by the people and for the people, being destroyed in Illinois, by the scoundrels led by Robert R. McCormick, Joseph Medill Patterson and their notorious Weymouth Kirkland.

.....

The Appointed Secretary
of the Joint Meetings

STATE OF ILLINOIS, }
COUNTY OF COOK. } ss.

Harrison Parker, being duly sworn, deposes and says that he was the appointed secretary of the Joint Meetings of the Ecumenical Council of the Puritan Church of the United States, held at the Masonic Hall, 32 W. Randolph Street, Chicago, on August 16, 1943, and in Chicago on February 5, 1944; that Deacon William Ede presided; that the above is a true amended copy of one of the resolutions unanimously passed at said meetings.

.....

Subscribed and sworn to before me this————day of January, A. D. 1945.

Notary Public.

[fol. 38] ATTACHED TO AND MADE A PART OF PARKER'S AFFIDAVIT OF JANUARY 4, 1945.

THE PURITAN CHURCH—THE CHURCH OF AMERICA.

The Anti Defamation League,
B'Nai B'Rith,
100 No. LaSalle Street,
Chicago, Illinois,

Gentlemen:

The Puritans of the U.S.A., organized into their Puritan Church, would like to work co-operatively and effectively with the Jews of the U.S.A., organized into their Anti Defamation League, to protect the institutions of the existing form of government, which if allowed to function naturally, and without any change, would automatically protect Jew, Catholic, Protestant, Puritan, the "laboring man," the Capitalists as well as all other groups.

Under the form of government of the U.S.A., as it exists, all could and should be Americans. There should not be groups of C.I.O.s, Manufacturers, Jews, Catholics, Protestants, Puritans, etc., which are being formed all over the country, at an alarming rate. The very fact that such organizations are being organized and growing so rapidly, shows that there is a general feeling that the government is no longer "a government of all the people, by all the people, for all the people," as it was originally described by a Puritan, Theodore Parker, and repeated by Lincoln.

The Puritan Mother grimly took her austere baby in her religious arms, and fled Europe over the ocean to bring up in a log cabin on American Soil, her little child to obey God—come what might come to him, come what might to other men—to obey God at all times.

To do that first, and all else as incidental to that, the direct Sires of the present members of this Church, set up the existing form of government, with their blood shed at Concord, at Bunker Hill, and at Valley Forge, fighting with guns along with Washington.

[fol. 39] The Puritan idea of government thus set up, is founded in human nature, and comes from the nature of God, who made human nature. To carry it out politically is to execute Justice, which is the will of God. This idea,

in its realization, leads to a democracy, a government of all, by all, for all.

To enjoy the shelter and the prosperity which naturally flows from such a government, the Puritans invited the Jews, the Catholics, and all other decent men and women throughout the world, to come to America and partake here, of the blessings which God always sends along with His shelter and His prosperity. And they came, by the millions, and working along with the Puritans, they made the U.S.A. the most powerful nation of the whole world, and the envy of the tyrants whose shores the Jews and the Catholics and all other groups, deserted to become Americans.

Now under the name of liberalism with specious promises of securities which are impossible under a government operating under the orderly laws of God, some scoundrels, some agitators, some self-styled editors, some wolves in sheep's clothing, some men insane from indulgence in the rich food and the luxury which always flow from an orderly government, are attempting with cock-eyed ideas on government, to destroy the form of government set up by the Puritans.

These, and their ideas, the descendants of the original Puritans in the Tenth Generation born on American Soil, and still members of this Church, will oppose; even if it be necessary to spill more blood on American Soil.

The law abiding, peace loving Jews, have as much of a stake in maintaining the existing form of government in the U.S.A. as the Puritans have. Therefore, this Church is writing this letter to you, to invite you to work co-operatively and effectively with it, for our mutual self-protection and for the mutual protection of our children and our homes.

In our previous letter to you, we stated that this Church had indisputable evidence that the Chicago Tribune, by a violation of the Constitution of Illinois, by a defiance of the law passed by her legislature and by the corruption of the entire Court system of Illinois, from [fol. 40] Eugene McGarry's corrupt Municipal up to and including Francis Wilson's crooked Supreme Court of Illinois, had stolen from the defenseless State of Illinois, a sum of money which with penalty and interest added,

now amounts to the approximate sum of 100 Million Dollars;

That one part of the stolen money had been checked out by the Tribune Company to its greedy multi-millionaire stockholders as cash dividends, at the rate of 500% per month, on an invested capital of $200,000; and the other part had been invested in a "Canadian Empire" that is now appraised at 50 Million Dollars cash;

That the steal was accomplished by the open notorious cowardly and illegal connivance between the Tribune Company, the owners of the Chicago Tribune, and two Jews: one Harry M. Fisher, a Judge of the Circuit Court of Cook County: and the other, Jacob Shamberg, the Assistant State's Attorney of Cook County;

That both of these gentlemen had been paid a large salary by the State, to protect the State, and both according to the evidence in our safe deposit vault, had in order to gain the favor of the thief, the Chicago Tribune, had criminally sold out the State which they had been paid to protect;

That this Church intended to compel the Chicago Tribune to disgorge every cent of the stolen money, and drive both Harry M. Fisher and Jacob Shamberg off the public pay-roll and into the obscurity that both had merited by their venal conduct in state affairs;

That strict legal evidence of the disgraceful conduct of both these gentlemen now in the possession of this Church, was open to your lawyers;

That if the evidence in the opinion of your lawyers were not perfect, this Church would proceed no further: that if it were perfect, this Church desired the Anti Defamation League to stand by its side, in the fight it intends to make on all concerned in this outrage on our government, if for no other reason than to prevent the fight on these men being called a fight against Semitism.

[fol. 41] Your answer to that letter addressed to the Anti Defamation League is here quoted:

> "I have referred this matter to our Director, Mr. Gutstadt, who desires that I advise you that this does not fall within the preview of the Anti Defamation activities, and we therefore will be unable to be of service to you.
>
> Very truly yours,
>
> Stanley S. Jacobs."

Notwithstanding this curt personal answer of the individual and unknown Mr. Jacobs, to an important letter addressed to your League by this Church, the Puritan Church still desires to woork co-operatively and effectively with the Jews, to protect the existing form of government for them as well as for the Puritans, and all other law-abiding and peace-loving groups.

The theft of a 100 Million Dollars from the State, by the Chicago Tribune, is a small matter compared with the pollution of the Courts of Illinois, which Robert R. McCormick, the Editor of the Chicago Tribune, personally ordered in a vain attempt to hide the enormous steal.

The Courts under the form of government set up by the Puritans, are the last bulwarks of our Liberties. When they can be corrupted as the record shows they have been, by the named men, neither Jew, Catholic, Protestant nor Puritan is any longer safe: life and reputation are in danger, and property is not worth the efforts to accumulate it: all are held at the sufferance of the scoundrel who can and will corrupt the crooked courts.

It is the opinion of our trustees, that in our previous letter, we did not adequately describe the evidence in the possession of this Church, which it intends to use in a national fight against the corruption existing in the Courts, whether the organized Jews fight side by side with it, or whether they fight against it. Here is the complaint of the Puritan Church:

The public records of Illinois show that for 66 consecutive years, the Chicago Tribune violated the Consti- [fol. 42] tution, defied the law passed by her legislature, and corrupted the public officials and the Courts, to aid it in its enormous steals.

When the evidence of its crimes were discovered and presented to Jacob Shamberg, the Assistant State's Attorney, responsible for the prosecution of such crimes, he refused to act. With the identical facts and identical law, he proceeded against the Pioneering Tailoring Company, which had committed against the State of Illinois, the same crime which the Chicago Tribune had. From the Pioneering Tailoring Company, he recovered for the defrauded State of Illinois, every cent of the stolen money: there was less than $20,000 involved in its steal, while

there was 100 Million Dollars involved in a like steal by the Chicago Tribune.

When Shamberg refused to act against the politically powerful thief, the Chicago Tribune, a taxpayer filed a lawsuit to compel it to disgorge its loot. Then, Shamberg joined the Tribune lawyers in attacking and slandering the brave citizen, and he made before the Courts obviously crooked motions aimed to illegally defeat the State and aid the Chicago Tribune to cover its steal.

One of these crooked motions was made by Shamberg before Judge Harry M. Fisher, before referred to in case 38-C-320.

The illegal order issued by Fisher in that case at the request of Shamberg to swindle the State which paid both Fisher and Shamberg to defend it, was more crooked than any ever issued by Judge Manton of Atlanta Prison.

This Church has a certified copy of Shamberg's crooked motion and Fisher's crooked order. No Court of final jurisdiction has ever upheld a single one of Shamberg's crooked motions, or Fisher's crooked orders: these will be submitted to your lawyers. If you do not agree in what we say about them, this Church will proceed no further in this matter. If they do agree, the Anti Defamation, as well as every other League of good citizens should be fighting with the Puritans.

[fol. 43] This order of the faithless Fisher in this litigation, appealed to the Supreme Court of Illinois, was so crooked that the entire Supreme Court of Illinois had to be either influenced, intimidated or bribed by the Chicago Tribune to write a crooked opinion, in case 24881, reported in 370 Illinois Supreme, at page 243, in a vain attempt to cover Fisher's judicial depravity: it is so crooked that even a corrupted Supreme Court cannot cover it, even with adroit language: it could not end the litigation as it was corrupted to do: a cause of action still remains.

If your lawyers will read this record and report after examining it, that it is not as vile as we have carefully described it, this Church will proceed no further against either Fisher or Shamberg. If your lawyers do report that it is as vile as we have described it, then the Anti Defamation League cannot afford not to co-operate with the Puritan Church in its determination to clean up the crooked Courts. Such Courts are as much a menace to

the Jews as they are to the Puritans: a crooked Jew Judge is as dangerous a foe to law and order and humanity, as a crooked Puritan, a crooked Protestant, or a crooked Catholic Judge.

Yes, the public records show that Robert R. McCormick, the Editor of the Chicago Tribune, is an all around scoundrel: he and his family under the constant plea for more "freedom from the press" have stolen from the State which protected them: more money than was stolen by the Tweed gang of New York, the Pendergast gang of Kansas City, and the Kelly gang of Chicago. The Medill McCormick Patterson fortune is the filthiest fortune ever accumulated in the U.S.A., according to the public records.

Yes, the Chicago Tribune is a powerfully entrenched, privately owned and corrupt newspaper.

Yes, the Chicago Tribune has on hand a surplus of more than 100 Million Dollars stolen from the State of Illinois, which it does not hesitate to use to destroy men who are brave enough to call it from court records, a menace to our form of government, and Robert R. McCormick who [fol. 44] has the stock control of it, a thief, a liar and a court fixer.

Yes, Robert R. McCormick has been the employer and business associate of hired Assassins, like Mossy Enright, Jake Lingle, Jack Gentleman, Philadelphia Jack Barry and other gangsters and murderers.

Yes, Robert R. McCormick employs as his general counsel, the eight times indicted Weymouth Kirkland, who has also been the general counsel for Moe Annenberg and other thieves, law-breakers and thugs: he is not allowed to practice law in the Courts of New York State. In the Appellate Court, in file No. 39804, there is proof that this Kirkland is a common hoodlum dressed up as a lawyer.

Yes, Robert R. McCormick, employs as the Managing Editor of the Chicago Tribune, the self-confessed "news faker" J. Loy Maloney; no government, no man, no property is safe with a news faker in charge of the news department of a Daily Newspaper.

Yes, Robert R. McCormick introduced scoundrelism into Journalism, hoodlumism into practice of law, and gangsterism into the business life of Illinois.

Yes, in Chicago now dominated in all departments of its government by men personally selected by Robert R.

McCormick and bally-hooed into office by the dishonest praise of his corrupt Chicago Tribune, the "scale" price or murder is $300. Any Jew, any Puritan, at any time, can be murdered on the Streets of Chicago and the murderer will go unpunished for $300.00. This Church possesses the evidence of the "scale" price, and it has strict legal evidence that since the "scale" price of murder was now dropped within the reach of all, the Tribune law firm founded by Robert R. McCormick, has tried several little "murder jobs" and has "railroaded" at least one innocent man to Joliet Prison where he was held for 8½ long years, and at least one innocent man to the Cook County Jail, where he was held until the cowardly and unscrupulous Weymouth Kirkland uninvited, personally called at the Jail and there released the outraged man, [fol. 45] as easily as he had been locked there by the Tribune law firm in a vain attempt to blackmail him to dismiss an orderly legal lawsuit which he had courageously filed against the blackmailing law breaking, constitution violating Chicago Tribune.

With these facts before them and a proffer of strict legal evidence to substantiate each and every allegation carefully made in this letter, we do not know what the Anti Defamation League of the B'Nai B'Rith is going to do. But we know what the Puritan Church is going to do: it is going to fight to restore and maintain in the U.S.A. the orderly law of God, as it is expressed in the Declaration of Independence, in the Constitution of the U.S.A. and the hearts of all decent men and women. And it is going to ask every man and woman in Illinois, with either property, children, or any other stake in the preservation of orderly peaceful government, to uphold it in spirit, if not with money, as the Anti Defamation League is upheld by the money contributions of the Jews, to end the anarchy that now exists in Illinois, with Judge Harry M. Fisher on the Circuit Court of Cook County and Jacob Shamberg as the Assistant State's Attorney of Cook County.

If the "activities" of the Anti Defamation League are confined as Mr. Jacobs intimates in his curt letter to merely protecting the Jews, even when they are engaged in destroying "from within" the institutions of govern-

ment which should protect all of us, it is time to widen its "activities" to protect the government which would automatically protect the Jews, if the Jews would join the Americans and compel it to function as it is outlined in the Declaration of Independence, in the Constitution of the U.S.A. and in the hearts of all decent men and women. We are

Very truly yours,
The Puritan Church:
By: .....

Harrison Parker,
Its Chancellor.

[fol. 46] ATTACHED TO AND MADE PART OF PARKER'S AFFIDAVIT OF JANUARY 4, 1945.

ATTACHED TO AND MADE PART OF PARKER'S AFFIDAVIT.

December 26, 1944

Hon. Francis Biddle
Attorney General of The U.S.A.
Washington, D.C.

Dear Sir:

I have been directed by the Ecumenical Council of The Puritan Church to forward to our Federal Government their petition of their grievances. This, by its order, was held until after the recent national elections and the Christmas holiday.

Robert R. McCormick, the editor of the Chicago Tribune and his crooked lawyer, the eight times indicted Weymouth Kirkland, have introduced scoundrelism into journalism, hoodlumism into the practice of law, and gangsterism into the business life of Illinois. They have corrupted the entire court system of Illinois, from Eugene McGarry's corrupt Municipal up to and including Francis Wilson's crooked Supreme Court of Illinois.

Neither life nor property nor reputation is any longer safe in Illinois. The "scale" price of murder in Chicago has been reduced to $300.00. There is strict legal evidence that Weymouth Kirkland, a hoodlum, and Howard Ellis, known as a writer of scurrilous anonymous letters, dressed

up as the "Tribune law firm," have been behind several attempted murder jobs in Chicago.

These gentlemen by the corruption of the entire taxing machinery of Illinois, and the pollution of its Courts to allow their depravities, have made it possible for the Chicago Tribune, a close private corporation, to steal from the defenseless State of Illinois, a sum of money which with penalty added, now amounts to the enormous sum of one hundred million dollars.

Our Puritan mothers took their austere babies in their religious arms and fled Europe over the ocean, to bring up on American soil their little children to obey the laws of God—come what might come to them, come what might come to other men—to obey the laws of God at all times. [fol. 47] Anarchy is the reverse of the law of God. According to the evidence in the possession of this Church, Robert R. McCormick and his Weymouth Kirkland are anarchists, destroying "from within," the government by law, set up with the blood of the direct sires of the present members of this Church, shed at Concord, at Bunker Hill and at Valley Forge.

The local Grand Jury has been "packed" by these unconscionable scoundrels, Robert R. McCormick and Weymouth Kirkland. Access to it has been sought and refused to men and women who have strict legal evidence of every allegation made in the enclosed petition of our grievances and repeated in part in this letter, and the legal right to appear with it before a Grand Jury.

We respectfully petition our federal government to convene in Chicago a special U. S. Grand Jury, in charge of a special prosecutor, in order that our complaints may have an orderly hearing such as is guaranteed to us by the Constitution of The United States.

We are,

Very truly yours
The Puritan Church
By .....
Harrison Parker
Its Chancellor.

ATTACHED TO AND MADE A PART OF PARKER'S AFFIDAVIT OF JANUARY 4, 1945.

THE PURITAN CHURCH—THE CHURCH OF AMERICA.

December 20, 1944.

The Illinois League of Women Voters,
225 North Michigan Avenue,
Chicago, Illinois.

Dear Mesdames:

This Church would like to work co-operatively and effectively with you, to amend the Constitution of Illinois. It can be re-written, only if the fight necessary to accomplish it, be around the depravities which the millionaire stockholders of the Chicago Tribune have committed, under the present Constitution.

[fol. 48] There is in the possession of this Church, strict legal evidence that by a violation of the Constitution of Illinois, for 66 consecutive years, the Chicago Tribune stole from the defenseless State of Illinois, a sum of money which with interest and penalty added, now amounts to the approximate sum of 100 Million Dollars.

In a vain attempt to hide this enormous steal, the Courts of Illinois from Eugene McGarry's corrupt Municipal, up to and including Francis Wilson's crooked Supreme Court, had to be either influenced, intimidated or bribed to ignore the Constitution of Illinois and defy the law passed by her legislature.

One part of the stolen money was paid out by the Chicago Tribune to its multi-millionaire stockholders, as monthly cash dividends, at the rate of 500% per month on their invested capital of $200,000; the other part was used to acquire a "Canadian Empire" which is now appraised at 50 Million Dollars.

The corporate surplus of the Chicago Tribune is over 100 Million Dollars; every cent of this would be used by the Chicago Tribune, if necessary to defeat any change in the present Constitution which has permitted it with the connivance of crooked Judges, to steal the money it now has. All this evidence is available either to your Lawyers, or to you in open meeting, to which the Chicago Tribune should be invited to attend.

The 20 odd Chicago Tribune stockholders do not want an income tax in Illinois: therefore, their privately owned newspaper will oppose you, and defeat you, unless you determine that the interests of the State are above the interests of the multi-millionaire stockholders of the Tribune. By hypocritically concealing its private interest behind a plea of a public interest, the tax thieves who have had the control of the Chicago Tribune, for three generations have defeated every attempt made by the decent persons of Illinois, to re-write its antiquated Constitution.

The seemingly public spirited editorial printed in today's Chicago Tribune, is a sample of the dastardly and cowardly influence which you and all other decent citizens must [fol. 49] fight, if Illinois is to be rescued from its jungle state.

Under the specious plea, that it is protecting the interests of the "boys at the front," the Tribune cunningly says, the Constitution must not be amended in their absence. Yet the records of Illinois show that while the "boys" were at the "front" in 1918, the Chicago Tribune stole from the State of Illinois, 12 Million Dollars, which it transferred to its stockholders as cash dividends. While "our boys" are at the "front" now, the Chicago Tribune with the connivance of the Kelly-Nash Machine which it keeps in power, has stolen another approximate Three Million Dollars.

A fight to re-write the Constitution will again end in naught. But a fight on the Constitution violations of the multi-millionaire Chicago Tribune, will as a "cushion spot," cause a public indignation which will result in the re-writing of the Illinois Constitution. Your organization having undertaken the task which it has, will lose its influence, unless it accomplish what is has undertaken.

We trust that you will send your counsel to view the evidence to which we have referred in this letter. If it be what we assert it is, we also hope that you either work co-operatively and effectively with us, or you permit us to work co-operatively and effectively with you.

Very truly yours, The Puritan Church, by Harrison Parker, Its Chancellor.

ATTACHED TO AND MADE A PART OF PARKER'S AFFIDAVIT OF JANUARY 4, 1945

IN THE CIRCUIT COURT OF COOK COUNTY

December 25, 1944.

Dear Dr. Richardson:

A very rich man of New York City has set up in New York City a trust fund, the proceeds of which are to be used to promote the activities of the Puritan Church. Inasmuch as the Puritan Church has no debts and all of its contemplated activities are adequately financed, I am [fol. 50] turning the first check from that fund, over to you, with the recommendation that you take it to Knight and Wilson, the agents for the building where we have our Chancellery, and ask them to accept it as advance payment for several months rent. This is merely a suggestion. As I recall it you signed the Lease.

Sincerely Harrison Parker.

EXHIBIT "B" TO AMENDED ORDER OF JANUARY 23, 1945

STATE OF ILLINOIS, } ss.
COUNTY OF COOK, }

THE PURITAN CHURCH—THE CHURCH OF AMERICA

Harrison Parker,
Plaintiff,
vs.
Jacob Shamberg,
Defendant.
} No. 43 C 13381

ANSWER

Plaintiff denies that he is "guilty of direct contempt of Court for filing in the Office of the Clerk of the Circuit Court of Cook County, on January 4, 1945, a certain affidavit containing as a part thereof certain false, malicious, scurrilous and defamatory exhibits purporting to be 'certified copy of a resolution passed at the joint meeting of the Ecumenical Council of the Puritan Church of the

United States and the College of Divines of the Brotherhood of the Ancient Order of St. John, held at the Masonic Temple, 32 W. Randolph Street, on August 16th, 1943,' and amended at the adjourned meeting held in Chicago on February 5, 1944, and also a purported copy of a letter on the letterhead of the so-called 'Puritan Church of America', addressed to 'The Anti Defamation League, [fol. 51] B'Nai B'Rith, 100 N. La Salle Street, Chicago, Illinois', and purporting to be signed by the 'Puritan Church, by Harrison Parker, its Chancellor'; and another certain purported copy of a letter on the letterhead of the 'Puritan Church—The Church of America', addressed to the 'Honorable Francis Biddle, Attorney General of the United States of America, Washington, D. C.', under date of December 26, 1944, and purporting to be signed 'The Puritan Church, by Harrison Parker, its Chancellor', in obstruction of justice and in abuse of the processes of the Circuit Court of Cook County and in manifest pursuance of a scheme to insult, defame, scandalize and blackmail the persons, firms and corporations mentioned in said scurrilous affidavit and exhibits thereto; all in disrespect of and in derogation of the authority and dignity of the Circuit Court of Cook County"; and he denies that any of these instruments filed were "in obstruction of justice and in abuse of the processes of the Circuit Court of Cook County and in manifest pursuance of a scheme to insult, defame, scandalize and blackmail the persons, firms and corporations mentioned in said scurrilous affidavit and exhibits thereto all in disrespect of and in derogation of the authority and dignity of the Circuit Court of Cook County"; and he denies that it, or any of it, is "all in disrespect of and in derogation of the authority and dignity of the Circuit Court of Cook County"; and plaintiff makes his answer in opposing the motion of the defendant herein to have plaintiff punished for direct contempt of court, or that a mittimus issue forthwith.

[fol. 52] 1. The plaintiff denies that he is guilty of direct contempt of court for having filed a certain affidavit containing as a part thereof, certain false, malicious, scurrilous and defamatory exhibits and matters hereinabove referred to, for the reason that each, every and all of the said exhibits thereto attached were and are a part of the record and/or communications of the said church as an

organized and existing religious corporation protected by the laws of the State of Illinois and the Constitution of the United States; that each and all said records and communications are properly chargeable to, and the responsibility of, said religious corporation; and that this plaintiff acted in his official capacity as an officer of said religious corporation, and not as an individual, in complying with the order entered against him which has brought on this contempt proceeding, for in his individual capacity, he would have had no access to any of the said records or communications of the said religious corporation.

2. Plaintiff answers that the motion heretofore granted by the Court to the defendant, requiring the plaintiff or other parties to bring in any matters pertaining to, or having to do with the Puritan Church of the United States, is in contravention of those rights guaranteed to this plaintiff by the Constitution of the United States, guaranteeing freedom of religious worship and is contrary to the similar provisions of the Constitution of the State of Illinois on the same point.

3. That despite the oft-repeated protest of this plaintiff in open court, orally and by writings and pleadings filed [fol. 53] in this cause, the plaintiff has frequently apprised the court of its illegal conduct and the illegal conduct that it has permitted and sanctioned on the part of the defendant and his counsel.

4. That notwithstanding the oral and written protestations apprising the court that it was violating the constitutional guarantees of the plaintiff, the court nevertheless illegally and unconstitutionally permitted the defendant repeatedly to violate the constitutional guarantees protecting this plaintiff, and in addition thereto, entered an illegal order requiring this plaintiff to bring into court and divulge those things and matters which the Constitution forbids being done by a litigant, by the Court and by both.

5. Plaintiff denies that any or all of the writings submitted in his affidavit of January 8, 1945, were purported copies, but on the contrary, reiterates that they are exact copies of writings that are properly part and parcel of the records of said Puritan Church and also, reiterates and states that the signatures thereon appearing on copies are the identical signatures that appear on the original writings. (Exhibits 2, 3, 4, 5 and 6.)

6. The Plaintiff denies that he is guilty of obstructing justice or abusing the processes of the Circuit Court, but on the contrary, states that if such be true, that the obstruction of justice and abuse of the civil processes of the Circuit Court were occasioned and brought about by the acts of the defendant, for the defendant for a long time prior to his motion to produce said documents has been well aware [fol. 54] of most of said documents and the gist of the contents thereof, that would be filed in carrying out the order of this court, for this plaintiff states that counsel for this defendant had been long before furnished partial copies of most of said documents, and were thoroughly familiar, at the time of the issuance of said order at their request, that these said writings would be filed in this matter in the event that such an order was prayed by the defendant; that the plaintiff therefore reiterates that the defendant and defendant's counsel alone are responsible for any obstruction of justice or abuse of the processes of the Circuit Court of Cook County, if any there be.

7. Plaintiff further denies that any obstruction of justice or abuse of the processes of the Circuit Court is the result of any scheme to insult, defame, scandalize and blackmail the persons, firms and corporations mentioned in said affidavit and its exhibits, but on the contrary, asserts that if there be any insult, defamation, scandal and blackmail, that it is on the part of the defendant and his counsel who, over a period of many years preceding this, have indulged in a vile, vicious, illegal and criminal conspiracy to insult, defame, scandalize and blackmail this plaintiff and that the records of this county are replete with evidence of the efforts of the said counsel.

8. The plaintiff further answers that all of the contents of said letters, documents and papers are true, yet if the defendant or any persons mentioned therein desire to refute the same, they have their opportunity to do so in proper [fol. 55] proceedings commenced against this plaintiff for just that purpose; yet, if as seems to be apparent here, the object of the defendant is to do by indirection that which he has not seen fit to do by direction, this plaintiff objects, that such procedure is illegal and without basis, in the instant proceeding.

9. This plaintiff further denies that the said affidavit and exhibits attached thereto are scurrilous and defamatory,

but on the contrary, he answers that the affidavits are a truthful and honest recitation of certain acts and facts which have been committed and are in existence by virtue of the specific acts, doings and characters of the defendant and those persons referred to and described in said affidavit and said exhibits, and plaintiff further admits that while the acts and doings of the said persons described in said affidavits may be scurrilous and defamatory, he denies the affidavit, by truthfully reciting said acts and facts, is scurrilous and defamatory, as a result thereof.

10. Plaintiff denies that the filing of his affidavit and said exhibits is, or is intended to be, in any manner, a disrespect of, or a derogation of the authority and dignity of said Court, but on the contrary, he asserts that the attempt of the defendant to entrap this plaintiff by forcing him to commit what the defendant now calls "direct contempt of this Court", by the use of the improper device of having an order entered that this defendant knew would result in the filing of this affidavit and these exhibits, the contents of most of which has long been familiar to the defendant, constitutes of itself, in the greatest degree, a disrespect and derogation of the authority and dignity of this Court [fol. 56] by the defendant, that is, the defendant himself is attempting to use the legal process in order to force this plaintiff to commit an act which this defendant could then complain to the Court about as being contempt of the court, yet in reality, the defendant now complains of an act done by this plaintiff in following, and strictly in accordance wit' the order of this court directed to him, and entered at the behest of the defendant, who, all of the time, was knowingly thereby attempting to entrap this plaintiff.

11. Plaintiff herewith most fervently opposes the motion of the defendant to have this plaintiff held in direct contempt of court for this plaintiff intended no contempt of this court, but on the contrary, by the order of this court entered on the motion of the defendant, has followed strictly the ruling of this court and has filed a truthful, honest affidavit in answer thereto.

12. That during the years, 1904, to 1909, this plaintiff was the advertising and business manager of the Tribune Company, which publishes the newspaper known as the Chicago Tribune, for which he was paid a salary of $25,000.00 per year; that while he was business manager of

the said corporation in the year, 1909, he was told by the assistant secretary of the Tribune Company to deliver bonds issued by the Japanese Imperial Government, of a par value of $150.00, to a certain partnership of lawyers with offices located on Clark Street in the City of Chicago; that he was informed by the then assistant secretary of the said Tribune Company that these bonds were to be used to "fix" [fol. 57] the Supreme Court of Illinois, and to induce it to write an opinion favorable to the said Tribune Company in certain litigation, then pending before said Supreme Court, which involved the interest of the said Tribune Company; that said litigation had been commenced by the then administration of Governor Dunne, to cancel, on the ground of fraud, a certain valuable lease of real estate, located at the southeast corner of Dearborn and Clark Streets, in the City of Chicago, which lease had been entered into by said Tribune Company with the Board of Education of the City of Chicago, owner of the fee; that the litigation sought the cancellation of the said lease between the said parties, on the grounds of fraud, for the Tribune Company was then receiving a cash profit of approximately $117,000.00 per year, upon the said lease; that the plaintiff refused to deliver said bonds or to have anything to do with the said illegal transaction, and then and there resigned his said position with said company and the salary that went with it; that said litigation the said plaintiff later discovered terminated in favor of the Tribune Company and in the year 1925 the said Tribune Company sold said lease at an additional profit of $6,040,000.00.

13. That after the resignation of this plaintiff as business manager of said Tribune Company, he became a business partner of J. L. Stack, and engaged in business under the name of the Stack-Parker Advertising Agency. While there, and so engaged, the plaintiff was approached by Mrs. Medill McCormick with the request that this plaintiff act as a companion to her husband, Medill McCormick, a [fol. 58] brother of Robert R. McCormick, president of said Tribune Company and publisher of The Chicago Tribune; that the plaintiff was requested to entertain said Medill McCormick on a horseback ride, then contemplated for both of them, over the battle fields of the Civil War; that he was then and there informed that the purpose of this request was that he, the plaintiff, would entertain and act

as a companion to the said Medill McCormick, pending the arrival in the United States from Switzerland of the world-famous alienist, Dr. Jung; that Drs. Worthy and Patrick, alienists, both of Chicago, had previously declared said Medill McCormick to be incurably insane, and they had sent for said Dr. Jung in order to consult with him; that the plaintiff acceded to said request so made to him to act as a companion to the said Medill McCormick, for the said purpose, and went to Chattanooga, Tennessee, where said Medill McCormick, his said wife, Dr. Jung and this plaintiff all lived at the Patten Hotel; that in the fall of 1910, the said Medill McCormick, brother of the said Robert R. McCormick, was examined by the said Dr. Jung of Switzerland, who had been called in to conduct a psychiatric examination of the said Medill McCormick; that all of these alienists pronounced the said Medill McCormick to be incurably insane; that Dr. Jung then and there told this plaintiff that the said Medill McCormick, brother of said Robert R. McCormick, was incurably insane, and that there was "a state of insanity in the McCormick family."

14. That in the month of August, in the year 1914, this plaintiff was and had been for some time the president of the Evening American Publishing Co., and publisher of [fol. 59] the newspaper then known as the Chicago American; that the said Medill McCormick, brother of the said Robert R. McCormick, appeared at the office of said newspaper, located in the City of Chicago, and then and there said to this plaintiff: "My brother is in a jam with another man, over the other's wife. A certain judge in Chicago has agreed to drag the husband into his courtroom and compel him to release his wife to my brother, if all the newspapers in Chicago will suppress all the news of what happens." That in reply to this statement made by the said Medill McCormick, this plaintiff replied that being a hired man, he had no authority to omit news from being published in the columns of said Chicago American; that thereafter, said Medill McCormick told this plaintiff that he would "rue the day" that he had refused this request and vowed the eternal hatred of the McCormick family and of said Chicago Tribune against this plaintiff, for having refused said request of said Medill McCormick; that some time thereafter, William H. Field, the then vice-president of the said Tribune Company, called upon this plaintiff at this plaintiff's same office, and then and there requested

this plaintiff to telephone to William Randolph Hearst, who at that time was at his San Simeon Ranch in California; that said Field further requested this plaintiff to explain the details of said sordid situation, involving the said Robert R. McCormick, to the said Hearst, and explain to him that the publication of the news of said matter might ruin the career of the said Robert R. McCormick, and to request leave of said Hearst, to omit from publication in the columns of the said Chicago American newspaper any [fol. 60] reference to this said sordid situation; that this plaintiff was well aware then and there that what said Field was referring to was a lawsuit then on file in the Superior Court of Cook County, entitled "Edward S. Adams vs. Robert R. McCormick", being No. 310206, dated August 5, 1914, in which said Robert R. McCormick was being sued by his cousin, Edward S. Adams, for alienating the affections of Adams' wife; that this plaintiff was also well aware of the fact that a suit had been filed in the United States District Court on September 26, 1914, bearing number 22619, entitled "Edward S. Adams, Bankrupt", and also upon the application of his own cousin, Robert R. McCormick; that this plaintiff did telephone to said Hearst, explaining the matter as it had been explained to him by the said Field; that said Hearst, then and there authorized this plaintiff to prohibit any reference to said sordid situation involving the said Robert R. McCormick, and prohibiting as well, any reference to either of said lawsuits involving said Robert R. McCormick, in the news columns of said Chicago American newspaper.

15. That on August 25, 1933, this plaintiff commenced an action at law for libel against said Tribune Company, it being numbered B 275638, and filed in the Circuit Court of Cook County, Illinois; that shortly thereafter, in the month of September, this plaintiff met Weymouth Kirkland, general counsel for the Tribune Company, at said Kirkland's suggestion, in said Kirkland's office, in Chicago, Illinois; that said Kirkland then and there told this plaintiff [fol. 61] that (a) said Robert R. McCormick, editor and publisher of said Chicago Tribune, which the said Kirkland represented, could not allow the courts of Illinois to assess any damages against newspapers; (b) that, in conformity with this settled policy, said McCormick had engaged said Kirkland to "fix" the Appellate Court of Chicago, to reverse and set at naught a verdict of $75,000.00

which a jury had assessed against the Illinois Printing and Publishing Company, in a libel action commenced against it; (c) that this fixing of said Appellate Court in the said case, had been done by said Kirkland; (d) that he, said Kirkland, upon the specific instructions of said Robert R. McCormick, in the future, would be compelled to fix all judges and all juries, to set at naught all damage claims which this plaintiff might have against this Robert R. McCormick, his Chicago Tribune and their interests; (e) that "as a friend" said Kirkland advised this plaintiff to "run along" and "not mix it" with said Robert R. McCormick in the courts. That this plaintiff was astonished at hearing this ill-advised bragging from the lips of this said Kirkland and so he went to the Appellate Court and there perused the record of the case reported in 218 Ill. App. 95, entitled: "William Fenimore Cooper vs. The Illinois Printing and Publishing Co."; that he there, in the light of what said Kirkland had told him, realized that said Kirkland had spoken the truth and that, although it was spoken in braggadocio and ill-advised, it was nevertheless true, for the verdict of the jury had been set aside and held for naught exactly as said Kirkland had bragged to this plaintiff, personally, that he had done; that this plaintiff then and [fol. 62] there realized that from the moment that Kirkland had spoken to him of his ability and prowess as "court-fixing", that said Kirkland and said McCormick would stop at nothing to pervert judges and juries and to prevent justice being done.

16. That this plaintiff decided that neither as a man, nor as a citizen would he or could he "run along" and "not mix it" with said Robert R. McCormick, as he had been advised to do by said Kirkland and for the very good reason then given him by said Kirkland, which was that said Kirkland promised and would undertake to "fix" all courts so that no one could win any litigation against said Robert R. McCormick and his Tribune Company.

17. Some time thereafter, Howard Ellis, a partner in said Kirkland's law office, sent for this plaintiff, who met him in said Ellis' office in Chicago; that Ellis then and there said to him, "If you do not dismiss that libel suit against the Tribune at your own cost, the Tribune is going to get rough with you"; that this plaintiff, from long experience with said Tribune Company understood, since said Kirkland

became general counsel for said Tribune Company, and said Robert R. McCormick, its president, what said Ellis had meant by said threat to said plaintiff made then and there, for said plaintiff well knew that many years ago, at the trial of William Lorimer, then United States Senator from Illinois, in the United States Senate, James Keeley of Chicago, who was then the managing editor, under said Robert R. McCormick's management, of said Tribune Company, had [fol. 63] under examination by Judge Eldrige Hanesy, counsel for said William Lorimer, testified under oath that the Chicago Tribune, under the management of said Robert R.McCormick, had employed on its staff many well-known police characters, ex-convicts and murderers, such as Mossy Enright and Jack Gentleman, who were paid by and hired to and did do said Tribune Company's "rough" work; that this plaintiff also well knew that in the file of the Federal District Court at Chicago, in a trial before the late Judge K. M. Landis, there is a record in the matter entitled "The Chicago Journal of Commerce vs. The Tribune Co." in which the said Tribune Company, under the management of the said Robert R. McCormick, had hired sluggers to do more of the said Tribune Company's "rough" work in "killing off" its morning newspaper competition in the City of Chicago. This plaintiff well knew that to proceed with his libel suit against said Tribune Company was to run the risk of having said Tribune Company either harm him physically, or assassinate his reputation in the columns of his newspaper, or to set his efforts in the courts at naught, in the manner described to him by said Kirkland and said Ellis; yet this plaintiff believed it to be his duty as a man and a citizen to fight such brazen corruption rather than yield to it and encourage the debauchery of the institution of his Government and his Country by the said Tribune Company, said Robert R. McCormick and said certain individuals practicing law under the general partnership name of Kirkland, Fleming, Green, Martin and Ellis, and [fol. 64] so he refused said request of said Ellis, so made to him.

18. At the time of the making of said request to plaintiff by said Ellis, this plaintiff was a party defendant in certain civil litigation then on appeal to the Appellate Court of Illinois, entitled: "Mae Quinliven vs. North American Trust Co.", numbered 36295. Shortly after said meeting between this plaintiff and said Ellis, Judge Ross Hall, a

judge of the Superior Court of Cook County then sitting in the Appellate Court of Illinois, handed down an opinion in the said Quinliven case, under the terms of which this plaintiff was ordered to pay to said Mae Quinliven $7,000.00 or be liable to be confined in the Debtors' Cell of Cook County for six months; that the record in the said case showed that though this plaintiff had never seen said Mae Quinliven, until he appeared in the court at the time of the trial, and that although he had never transacted any business with said Mae Quinliven, either directly or indirectly, nor had he owed her any money, nevertheless, there had been a finding against this plaintiff.

19. That this plaintiff decided that wrong, improper and illegal as the decision of the Appellate Court had been, he must go to jail, and on May 13, 1934, he entered the Debtors' Cell of Cook County Jail.

20. The next day when this plaintiff read in the pages of the Sunday Tribune of May 14, 1934, the sensational article that therein appeared, describing his incarceration in the debtors' cell, the true import and connection between the said threat made to him by said Kirkland and later made [fol. 65] to him by said Ellis, and the wholly ungrounded decision of the said Quinliven case in the said Appellate Court made by the said Judge Ross Hall, came upon him; that his suspicion of the complicity of said Kirkland, said Ellis and said Judge Ross Hall, in this plaintiff's being lodged in the debtors' cell, became a certainty, upon his receipt in said debtors' cell of a message from said Ellis to this plaintiff, telling this plaintiff that he, said Ellis, and "some friends" would pay $7,000.00, to said Mae Quinliven and thereby effect the release of this plaintiff from the jail of Cook County if this plaintiff would promise, in return therefor, to dismiss his libel suit still pending against the said Tribune Company; that to this proposal from the said Ellis, this plaintiff replied that he "preferred the jail" and that he would undertake to compel said Tribune Company to stand trial in this plaintiff's libel suit against it.

21. That shortly after this plaintiff's refusal of the said proposal sent to him by said Ellis, and while this plaintiff was still in the Debtors' Cell, John Moneypenny, warden of said jail, informed this plaintiff that a man armed with a knife had been found in this plaintiff's cell and that said armed man had been placed there by the said Tribune law

firm, Kirkland, Fleming, Green, Martin & Ellis, to kill this plaintiff in said jail.

22. That upon the receipt of this information from the said John Moneypenny, warden of said jail, this plaintiff wrote a letter to John D. Black of Chicago, then president of the Chicago Bar Association, and informed him of that [fol. 66] which this plaintiff had been told by said John Moneypenny; that said John D. Black made no reply to this letter, nor did said Chicago Bar Association.

23. That four months later, another attempt upon the life of this plaintiff was made while he was still in said county jail; that two of the cell mates of this plaintiff had almost died of eating cake which contained arsenic and which had previously been offered to and refused by this plaintiff, and for he had been warned by said John Moneypenny that he, the plaintiff, would be safer if he would eat of the same food and at the same time and place, with the prisoners other than those in said debtors' cell.

24. That on the happening of this second attempt upon his life, this plaintiff wrote a letter to said Robert R. McCormick, in which he detailed both instances of these attempts upon his life while he was in jail; that in said letter, he charged that said Robert R. McCormick, through his lawyers, had tried twice to murder him and thus dispose of both this plaintiff and of his still-pending libel suit against said Tribune Company; that the next day, unsolicited by this plaintiff, said Weymouth Kirkland called in person at the Cook County jail and there released and freed this plaintiff, without any further effort or act upon the part of this plaintiff.

25. The Constitution of the State of Illinois, Article IX, Sec. 1, provides that: "Every person and corporation shall pay a tax in proportion to his, her or its property—such value to be ascertained by some person or persons to be elected or appointed such manner as the general assembly shall direct * * * not otherwise; but the general [fol. 67] assembly shall have power to tax * * * persons or corporations owning or using franchises and privileges, in such manner as it shall from time to time direct by general law, uniform as to the class upon which it operates." The Legislature of Illinois has determined that the capital stock tax of domestic corporations shall be paid by the corporation and not by the holder of it: The method of

determination has been approved by the State of Illinois through long usage and in addition, the method has been approved repeatedly by the Supreme Court of Illinois and approved by the Supreme Court of the United States; that neither the law nor its applications has ever been modified or annulled, by any court of last resort. (Exhibit 1.)

26. That the Revenue Act of the State of Illinois provides that taxable property that has been omitted, when discovered, must be listed and assessed by the taxing officials.

27. That in the summer of 1935, this plaintiff presented to Jacob Shamberg, then an assistant state's attorney of Cook County, and now, a first assistant state's attorney of Cook County in charge of civil actions, and the defendant herein, evidence that certain personal property owned, possessed and controlled by said Tribune Company of enormous value had long been omitted from the tax rolls, to-wit: for sixty-six years; that this plaintiff then and there exhibited to said Shamberg certified copies of the balance sheets of said Tribune Company for said years in which its taxable property which had long been omitted, was listed, and this plaintiff, in addition thereto, then and there [fol. 68] exhibited to said Shamberg certified copies of the books of the Cook County Assessor, for the same said sixty-six years which contained no listing or assessment of that vast amount of property owned, controlled and possessed by said Tribune Company and set forth and described in its said certified balance sheets.

28. That upon the presentation by this plaintiff of the two sets of certified copies of both the balance sheets of the Tribune Company and of the books of said County Assessor, for the same said identical years, it became and was the duty of said Shamberg, as a law enforcement officer of said county, to act and correct said long-standing tax avoidance by the said Tribune Company, there being, as said Shamberg well knew, no provision in the law of Illinois, for the compromise of either taxes, penalty or interest on this omitted personal property.

29. Instead of doing his sworn statutory duty, said Shamberg refused to act against said Tribune Company, whereas said Shamberg well knew that the law required him to do so, as he had done before and since, in other similar tax matters against other corporations which have been guilty of the

identical violation of the Revenue laws of the State of Illinois.

30. That in 1935, this plaintiff, as a citizen and a taxpayer, filed a complaint before the Board of Appeals of Cook County, to compel the listing and the assessing of taxable personal property that was set forth under oath, on the certified balance sheets of said Tribune Company, but [fol. 69] omitted from the certified tax rolls of Cook County, in the hands of John S. Clark, the Cook County Assessor.

31. In the trial before said Board of Appeals, said Kirkland, instead of answering the sworn complaint then before that body, setting forth that valuable property of said Tribune Company had been omitted completely and illegally from the tax rolls of Cook County for sixty-six years, said to said Board of Appeals, and those persons there assembled, of and to this plaintiff, "You rat * * * you dirty rat * * * you blackmailer, * * * you contemptible blackmailer * * * you ought to be taken for a ride." 298 Ill. App. 340-362; that thereupon this plaintiff commenced an action at law for slander in the Circuit Court of Cook County, against said Kirkland; that said lawsuit came before Judge Joseph Sabath, who, contrary to what was then the law of this state, dismissed the complaint upon said Kirkland's motion to strike.

32. This wrongful decision of said Judge Sabath was appealed to the Appellate Court of Illinois; that there, Judge Hugo Friend, in an unusually long opinion consisting of twenty pages set aside what had heretofore been the established American rule of law, and the law of the State of Illinois, and substituted for it, the English rule which had never been the law of Illinois; yet, Kirkland had not uttered the objectionable words in a court; he had spoken them before an administrative body, the Board of Appeals of Cook County, so Judge Friend decided that the Board of Appeals of Cook County was a quasi-judicial body, and sustained Judge Sabath's decision.

[fol. 70] 33. That thereupon, after the refusal of said Shamberg to perform his sworn statutory duty, this plaintiff commenced a taxpayer's action in mandamus to compel the taxing officials of said Cook County to list and assess all of the said omitted personal property under the ownership, custody and control of said Tribune Company as set forth in the said certified balance sheets of the said Tribune

Company, and whose omission from listing and assessment of the tax rolls of Cook County was apparent from the said certified copies of the books of the Assessor of Cook County.

34. That said action was dismissed on a motion to strike in the trial court and upon appeal to the Supreme Court of Illinois, the said motion was sustained on the ground that the action had been prematurely brought, that is: that the mandamus proceeding had been commenced before the said Board, in the judgment of the Court, had had sufficient time to act upon the matter presented to it in the said certified copies of the balance sheets of said Tribune Company and the books of said Cook County Assessor.

35. That thereafter, this plaintiff commenced another action in mandamus for the same said purpose, after the taxing officials of said county had again made a determination of the evidence contained in said books of said Tribune Company and said Assessor had again refused to list or assess any of said omitted property. That the decision of the Board of Appeals of Cook County was heard by Judge Harry M. Fisher on mandamus, in case No. 38C 3209; Fisher's son, David, was then employed in the law office of [fol. 71] said Kirkland, as his assistant; previously the Supreme Court of Illinois, 367 Ill. 559, 569, had decided: "The Tribune Company is the property owner named in the complaint and we expressly held, in People vs. Webb, 256 Ill. 364, that property owners are not necessary or proper parties in such a proceeding as this." Notwithstanding this clear ruling of the Supreme Court of Illinois, said Judge Fisher, upon the application of said Kirkland, and despite the protest of this plaintiff, entered said Tribune Company as a necessary and proper party to this mandamus lawsuit. Then it was assigned to another judge; that by this illegal order of Judge Fisher, a proper lawsuit to compel the Tribune Company to pay to Cook County, the money which it owes for taxes, was invalidated. That then, Judge Joseph Burke, on motion of said Shamberg and Kirkland, dismissed the action.

36. That this plaintiff then appealed to the Supreme Court of Illinois, which in an opinion of thirty-five lines which appears on Page 243, Volume 370, of the Supreme Court Reports of Illinois, disposed of this matter involving in excess of 100 million dollars due to the State of Illinois, for some of the same reasons that it gave in the earlier opinion.

37. That thereafter this plaintiff commenced another action in mandamus for the same said purpose, after the taxing officials of said county had made a determination of the evidence contained in said books of said Tribune Company and said Assessor had refused to list or assess any of said omitted property; said Shamberg then and there in violation of his sworn statutory duty, joined [fol. 72] forces with the said Tribune Company and along with its counsel, filed certain motions to defeat the State of Illinois, identical with those filed by said Tribune Company, some of which were typed in the office of said Tribune law firm, Kirkland, Fleming, Green, Martin & Ellis; that these objections were: (1) mandamus was not the proper action; the writ of certiorari was the proper action; and (2) that this proceeding was res judicata; yet this objection was subsequently held by Judge Niemeyer to be groundless; and (3) that non-uniformity had not been alleged, yet the allegation that property was omitted from listing and assessment is non-uniform with all other property that has already been listed and assessed.

38. That in case No. 39S 7549 filed in the Superior Court of Cook County thereafter, Judge Grover Niemeyer in 1940 ruled, after hearings lasting over a year, that (a) mandamus was the proper remedy, and (b) there was no res judicata: he did not rule on said Shamberg's third objection. That thereafter, sensing that further action in said proceeding, No. 39 S 7549, would not yield a clear presentation of the precise question involved for appeal to the Supreme Court, this plaintiff dismissed said proceeding without prejudice. That the foundation for a fourth mandamus hearing before the Board of Appeals has been concluded and this plaintiff is preparing to proceed once more to enforce the listing and assessment of said omitted property from the tax rolls of said Cook County; that no court of final jurisdiction has sustained any of the said objections [fol. 73] of the said Shamberg and Kirkland.

39. That thereafter, this plaintiff's libel suit was tried before a jury; that two days were consumed with direct examination, and approximately three months were occupied with cross-examination, that about 200,000 pages of testimony and exhibits were used; the jury deliberated less than one hour, and returned a not guilty verdict, as said Kirkland had promised would happen, three years

before, when he had told this plaintiff why this plaintiff would never win, either against said Robert R. McCormick or his said Tribune Company.

40. That having been denied access by the State's Attorney to the Cook County grand jury, to advise it of the omission from the tax rolls of Cook County of the taxable personal property in the possession, custody and control of said Tribune Company, on which the accumulated taxes, penalty and interest amounting then and now to a sum in excess of 100 million dollars, this plaintiff was advised by a lawyer, that it was his duty as a man, a citizen and a taxpayer, to write the facts in a letter, to the grand jury; this, this plaintiff did, in a letter to which he signed his name; that neither the then Chief Justice of the Criminal Court of Cook County, Judge John Prystalski, nor the State's Attorney of Cook County, but John W. Norkett, a private detective employed by said Tribune Company and its said law firm, cited this plaintiff in an information being numbered A40, before said Judge Prystalski, for contempt of court; the exact charge set forth in said information being "writing a letter to the grand jury."

[fol. 74] 41. In his answer, this plaintiff by citing prior leading decisions in which the Supreme Court of Illinois had decided that the grand jury could get its evidence anywhere; this plaintiff proved to Judge Prystalski that he had not been guilty of contempt of court, for "writing a letter to the grand jury"; that Judge Prystalski instead found him guilty of "obstructing justice" and sentenced him to the Cook County Jail for ten days; that this sentence of ten days in the Cook County Jail by Judge Prystalski, was appealed by this plaintiff in Supreme Court Case No. 25595; that there this plaintiff proved to the Supreme Court, that writing a letter to a grand jury was not "obstructing justice"; so that the Supreme Court of Illinois based its decision on an entirely new charge, "writing letters to a grand jury which had a tendency to obstruct justice;" that for these said communications said Supreme Court decided that this plaintiff must serve ten days in the Cook County Jail; that the opinion of the Court is reported in the Reports of the Supreme Court of Illinois, Volume 374, Page 524.

42. This decision could not be appealed to the Supreme Court of the United States because this plaintiff had not

in his answer raised the question of his rights under the Federal Constitution; that this plaintiff therefore went to the Cook County Jail for ten days.

43. That the records of the County Court in the County Building, Chicago, Cook County, in Case No. 25521, dated October 29, 1938, "Estate of Katherine Medill McCormick", show that not a single penny was received by the State [fol. 75] of Illinois, as an inheritance tax from that estate; that this and other state records show that said Mrs. McCormick was born in Chicago; went to school in Chicago; was married in Chicago; all of her children were born in Chicago; her father had lived in Chicago for more than fifty years; her family residence had been her father's home, at Wheaton, Illinois; her will was made in Chicago; in it she stated that she was a resident of Chicago; she had notified the Collector of Internal Revenue at Washington, D. C., that her official address was at 33 North LaSalle Street, Chicago; she is buried in the Medill family cemetery plot in Chicago; she was known in Bradstreet's reports as one of the two richest women who have lived in Chicago; that on these facts and the inheritance tax laws of Illinois, the State of Illinois was entitled to an inheritance tax in proportion to the value of the estate, worth at least 25 million dollars; yet it did not receive a single cent for Weymouth Kirkland, the general counsel of Robert R. McCormick, has boasted that all the courts of Illinois can be "fixed" in matters in which Robert R. McCormick had a money interest; and so with no publicity, Robert R. McCormick got on the witness stand and testified that his mother, Katherine Medill McCormick, who had died in Paris, France, while on a tour of Europe, was not a resident of the City of Chicago; that said McCormick was followed on the witness stand by Weymouth Kirkland, McCormick's general counsel and also, lawyer for the dead and defenseless Katherine Medill McCormick; said Kirkland had written into the said will signed by said Katherine Medill McCormick that she was a resident [fol. 76] of the City of Chicago, Illinois; said will had been probated by said Robert R. McCormick and said Kirkland, all its provisions were satisfactory to them, except that one under it by which the State of Illinois was entitled to an inheritance tax of several millions of dollars; that provision alone was not satisfactory to said Robert R. Mc-

Cormick, the executor of the will; that said Kirkland also, took an oath and he, too, testified that his client, in whose will he had written that she was a resident of Chicago, was not a resident of Chicago; that then to the witness stand came some servants of the Medill family and some appraisers who swore that the jewels possessed by this enormously rich woman were practically tinsel, and not of enough value to be even considered; that the State of Illinois which had several million dollars at stake in these proceedings was then and there without proper representation.

44. That thereupon the hearing officer therefore decided as Robert R. McCormick wanted him to do; all the money in that estate belonged to Robert R. McCormick and the other millionaire beneficiaries of this fabulously rich Chicago citizen; this plaintiff asserts that upon the record of that proceeding that said Kirkland's boast of his "court-fixing" prowess is apparent.

45. That it is of but little importance to the State of Illinois, or to the United States of America, if this plaintiff is confined in jail for six months, as has been suggested to the Court herein, by the Tribune lawyers, Kirkland, Fleming, Green, Martin and Ellis, who represent the defendant herein, but it is of the utmost importance to [fol. 77] the State of Illinois and to the United States of America and the people of both, that said Robert R. McCormick, his said Tribune Company and their satellites, said Kirkland, and their agents and employees be, now and forever, prevented from continuing their own calculated scheme of insult, defamation, scandalizing, blackmail, terror, bribery, murder, theft, perjury, fraud, libel, corruption, anonymous letter writing, and forgery commenced in 1911, when said McCormick became president of said Tribune Company, and said Kirkland became counsel for said McCormick and said Tribune Company, and which scheme is still continuing; that during the thirty-four years in which this scheme for making money at any cost, by the adroit use of the threat of bad publicity in the said Tribune, and the use of its vast financial resources, as well as many combinations and variations that they devised and used, as the need arose, from time to time, said Tribune Company, McCormick and Kirkland have been able to gain their too-frequently illegal ends by either

terrorizing those who oppose them, or performing the necessary maneuvers in secret; that by its and their said conduct, over this long period of time, said Tribune Company, said Kirkland, and their hirelings have and have shown, not only their contempt for all other citizens of this state, but for the State of Illinois, and the United States of America; that their scheming campaign has resulted in the debauchery of many public officials in the State of Illinois, and unless stopped will result in the complete destruction of the government of the State of Illinois.

[fol. 78] 46. That as is hereinbefore set forth and as fully appears hereinbefore, certain rights of this plaintiff guaranteed to him both by the Constitution of the United States and the Constitution of Illinois have been violated despite certain provisions in both constitutions to the contrary.

47. That Article IV, Section 4 of the Constitution of the United States provides: "The United States shall guarantee every state in this union a republican form of government"; that a republican form of government is a government of representatives chosen by the people; that judges, too, are representatives chosen by the people, yet as hereinabove more fully appears in certain of said proceedings, said certain judges and other representatives of the people, have not performed their duties as representatives of the people, but have acted as the reprsentatives of said Robert R. McCormick, and his interests; that at the present time, and for a long time prior hereto, the republican form of government guaranteed to the State of Illinois has ceased to exist, all in violation of the specific provisions of said section.

48. That in Article VI appears a strict injunction that "this Constitution * * * of the United States * * * shall be the supreme law of the land and the judges in every state shall be bound thereby."

49. That in each, every and all of the said proceedings here mentioned and described, which this plaintiff has hereinabove set forth more fully, he has been deprived of his property without due process of law; and that he has in certain of said proceedings been deprived of his [fol. 79] liberty without due process of law; that in certain of said proceedings, his private property has been taken for public use without just compensation, all of which

are in direct contravention, and contrary to, the provisions of the Fifth Amendment to the Constitution.

50. That in certain of said proceedings hereinabove more fully set forth, the plaintiff has been deprived of the free exercise of religion, the freedom of speech and of the right to petition his government for a redress of said certain grievances in contravention of, and contrary to, the provisions of the First Amendment to the Constitution.

51. That in certain of said proceedings hereinabove more fully set forth, the plaintiff has been deprived of the privileges and immunities properly guaranteed to him as a citizen of the United States, and he has been deprived of his liberty and property without due process of law, and he has been denied the equal protection of the laws, all of which are in contravention of, and contrary to, the provisions of the Fourteenth Amendment of the Constitution.

That this plaintiff, Harrison Parker, having fully replied to the rule to answer made upon him, prays that he be found and determined to be purged of any contempt of this Court, and that he be forthwith discharged.

HARRISON PARKER,
Plaintiff.

[fol. 80] *Duly sworn to by Harrison Parker, jurat omitted in printing.*

[fol. 81] EXHIBIT 1 TO PARKER'S ANSWER OF JANUARY 15, 1945.

Year _____
Town _____

	1923
	Tribune
1. Horses	_____
2. Cattle	_____
3. Mules & Asses	_____
4. Sheep	_____
5. Hogs	_____
6. Steam Engines	_____
7. Safes	_____
8. Billiard Tables	_____
9. Carriages & Wagons	_____
10. Watches & Clocks	_____

11. Autos	
12. Piano Fortes	
13. Melodeons & Organs	
14. Franchises	
15. Annuities & Royalties	
16. Patent Rights	
17. Steamboats, Vessels, etc.	
18. Merchandise	
19. Material & Mfgd Articles	
20. Manufacturer's Tools, Implements & Machinery	
21. Agricultural Tools, Implements & Machinery	
22. Gold or Silver Plate	
23. Diamonds and Jewelry	
24. Money of Bank, etc.	
25. Credits of Bank, etc.	
26. Moneys of other than Bank, etc.	
27. Credits of other than Bank, etc.	
28. Bonds or Stocks	
29. Shares of Stock of Companies not incorporated by laws of this State	
30. Property of Pawnbroker.	
31. Property of Companies and Corporations other than property hereinabove enumerated	50,000
[fol. 82] 32. Bridge property	
33. Property of Saloons and Eatinghouses	
34. Household or Office Furniture	
35. Investments in Real Estate	
36. All Other Property	1,051,000
Total Full Value	1,101,000
Total Assessed Value	550,500
Corrected by Board of Review	550,500

The statements here appearing, both for the year 1923, are typical for each of the other 66 consecutive years of flagrant tax evassion by the Tribune Company, complained of to the Supreme Court of Illinois in People ex rel. Parker vs. Whealan, 370 Ill. 243.

That on the left for 1923, appears in the public records of the Assessor of Cook County, Illinois. Its accuracy has been sworn to by L. A. Hodson, an attorney for the Tribune Company.

That below, also for 1923, appears in the public records of the Clerk of the Supreme Court, at Springfield, Illinois. Its accuracy has been certified by a Commissioner of the Supreme Court of Illinois who examined the books of the Tribune Company in connection with litigation between Tribune stockholders: Lloyd vs. Lloyd, 341 Ill. 461.

Both statements as they here appear, were in the record and within purview of Justice Shaw, then Chief Justice of the Supreme Court of Illinois, when he so peremptorily dismissed this important litigation brought by the State of Illinois, involving such important rights, principles, and property of the citizenry, as well as the constitutional rights of a sovereign state, without any heed to the issues set forth.

The Tribune Company dared not go to trial, as Justice Shaw well knew. And by this maneuver, he deprived the State of a trial, thus foreclosing his state from simple [fol. 83] justice. To insure the Tribune's escape from its vulnerable position, occasioned by its long-continued defrauding of its own state, he made short shrift of this most important litigation with an opinion of 35 lines.

THE TRIBUNE COMPANY

Condensed Balance Sheets and Statement of Net Profits From Operations and Dividends Paid (From Lloyd vs. Lloyd, 341 Ill. 461)

Assets as of December 31, 1923

Leasehold	$ 203,097.82
Building	1,892,817.47
Plan, Machinery & Equpiment	3,010,546.25
Investments	3,404,322.84
Chicago Building Co. Stock	2,911,900.00
Working Assets	1,407,227.95
Current Assets	3,068,762.84
Real Estate, excluding Tribune Building	260,120.64
Total Assets	$16,158,795.81

Liabilities

Capital Stock	$ 200,000.00
Surplus	9,831,705.96
Current Liabilities	2,199,469.95
Service Liabilities	101,758.95
Reserve for Doubtful Accounts	328,912.20
" " Taxes	727,938.97
" " Dep. Tribune Bldg.	425,877.61
" " Leasehold	54,375.95
" " Machinery & Equip't	1,442,259.82
" " Real Estate except Tribune Building	19,136.40
Miscellaneous Reserves	827,360.00
Total Liabilities	$16,158,795.81
*Net Profit for the year	$ 4,365,047.40
Dividends	3,300,000.00

*From operations before payment of dividends.

[fol. 84] Exhibit 2 to Parker's Answer of January 15, 1945.

State of Illinois, } ss.
County of Cook. }

In the Circuit Court of Cook County

Harrison Parker, *Plaintiff.*
vs.
Jacob Shamberg, *Defendant.*
No. 43 C 13381

Affidavit.

Harrison Parker, having first been duly sworn on oath, deposes and says:

Answering questions numbered on the defendant's Motion dated December 28, 1944, one, two, three, four, five, six, seven, eight, nine, ten, fourteen, fifteen, sixteen, seventeen, eighteen, nineteen, twenty, twenty-one, twenty-six, twenty-nine, thirty, thirty-one, this Affiant has not now, nor has he ever had in his possession, power, custody or

control nor has he ever seen any originals, duplicate-originals, and copies of all letters, telegrams, writings, memoranda, etc., passing between—and also all Minute Books, written Resolutions, By-Laws, Trust Deeds, Contracts, Books of Account, Invoices, Receipted Bills, Cancelled Checks, Check Stubs, Bank Statements showing or reflecting any dealings between—any of the following persons, firms, corporations, and pretended religious corporations or bodies, during the period between January 1st, 1940 up to and including the present time.

[fol. 85] Answering questions eleven, twelve and thirteen, this Affiant, in November 1944, when he moved his private files from 4534 Greenwood Avenue, Chicago, destroyed all his correspondence with Messrs. Miner, Norris and Race, along with a lot of other useless and unimportant to him, letters, records, etc.

Answering questions twenty-two, twenty-four, twenty-five, twenty-seven, twenty-eight and thirty-two, this Affiant had the original Articles of Incorporation and their By-Laws in his possession sometime during 1940 or 1941; these he left with Harris F. Williams, 230 South Clark Street, Chicago, where they were held, until they were called for and delivered to Mr. Conrad Miner.

Answering question thirty-three, this Affiant received the original Articles of Incorporation and the By-Laws from Harris F. Williams and delivered them to Dr. Agnes Richardson of Berwyn, Illinois.

Answering question thirty-two, this Affiant had them in his possession at one time and delivered them to Mr. Conrad Miner.

Answering questions thirty-four, thirty-five, thirty-six and thirty-seven, this Affiant attaches herewith as Exhibits A, B, C and D, all of the requested documents now in his possession, custody, power or control; all others were destroyed when this Affiant moved his office last November.

Answering question numbered thirty-eight, this Affiant never did, at any time, under any circumstances do business under the name and style of "Puritan Church," "The Puritan Church Committee, etc. to Moderator."

[fol. 86] Answering question twenty-three this Affiant never heard of, nor has he ever had any connection with such an organization.

Answering question number thirty-seven, this Affiant attaches herewith all the requested documents which he has

at present in his possession, power, custody or control, with any of the persons, firms or corporations numbered one to thirty-eight.

..... (Seal)
Harrison Parker.

Subscribed and sworn to before me this ——— day of January A. D. 1945.

.....
Notary Public.

[fol. 87] EXHIBIT 3 TO PARKER'S ANSWER OF JANUARY 15, 1945.

CERTIFIED COPY OF A RESOLUTION PASSED AT THE JOINT MEETING OF THE ECUMENICAL COUNCIL OF THE PURITAN CHURCH OF THE UNITED STATES AND THE COLLEGE OF DIVINES OF THE BROTHERHOOD OF THE ANCIENT ORDER OF ST. JOHN, HELD AT THE MASONIC TEMPLE, 32 W. RANDOLPH STREET, ON AUGUST 16TH, 1943 AND AMENDED AT THE ADJOURNED MEETING HELD IN CHICAGO ON FEBRUARY 5, 1944.

Whereas, the direct sires of the present members of this Puritan Church fled England to escape the tyranny of government by man, and braved the dangers of the sea, of an unknown forest, a wilderness and the aboriginal Indian, to dwell as free men on American soil;

And Whereas, the direct sires of the present members of this Puritan Church fought and bled at Concord, at Bunker Hill, and died at Valley Forge, to establish on the same soil, a government by law, instead of by man;

And Whereas, the constitution of the government thus set up by the Puritans, protects the laboring man in the possession of his cottage, and the millionaire in his palace, the Jew, the Catholic, the Protestant and the Puritan in the worship of God;

And Whereas, this established government invited the peace-loving, the home-loving, the industrious and the law-abiding of the earth, to emigrate to it, and share with the Puritans, the blessings and the happiness that flow from the living under such a government;

[fol. 88] And Whereas, along with the peace-loving, the home-loving, industrious and the law-abiding, there came

to the hospitable but unprotected shores of this orderly government, a lot of scoundrels, rascals, black legs, riff-raff, and the dregs of the outpouring of the cellars of the earth;

And Whereas, Joseph Medill, an Irish emigrant, arrived in the U.S.A. along with this mixed crowd in the steerage.

And Whereas, as soon thereafter as it was possible, after he had been fumigated and deloused at Ellis Island, this Joseph Medill set up a corporately owned newspaper called the Chicago Tribune, whose money-making policy was: (1) to make circulation by being, in its news and editorial columns, "Agin" the government in power, with libels of its leaders; (2) to make cash dividends by blackmailing the elected public officials to allow it to steal money from the County which protected it in its infamy;

And Whereas, the public records of Cook County show that the Chicago Tribune, under the management of the said Joseph Medill, cheated the law-abiding citizns of Cook County of the approximate sum of 15 million dollars, by a cunning and hidden violation of the Constitution of Illinois, by defying the law passed by her legislature and by bribing the elected public officials and the courts;

And Whereas, the stock control of this Chicago Tribune, passed by inheritance, to Eleanor Medill Patterson, and Katherine Medill McCormick, the only living children of said Joseph Medill;

And Whereas, these two women allowed the Chicago Tribune to continue the cowardly and dishonorable policy [fol. 89] of their father, whereby another approximately 20 million dollars was stolen by the Chicago Tribune from the unsuspecting and docile citizens of Cook County, by the use of the same money-stealing scheme that was original with their cunning father;

And Whereas, these two women, Eleanor Medill Patterson and Katherine Medill McCormick, were each detected, tried and convicted and penalized by the United States Government, for withholding from that government an enormous sum of money due to it, as Income Taxes. (The scheme the women used was set up for them, in Weymouth Kirkland's crooked law office; its other tax clients, Moe Annenberg, and other scoundrels had to do long "stretches" in Leavenworth Prison for using similar schemes.)

And Whereas, the stock control of the Chicago Tribune, descended again by inheritance from these two women, to Joseph Medill's grandchildren, Robert R. McCormick, the so-called Editor of the Chicago Tribune and Joseph Medill Patterson, the Editor of the New York Daily News, and Eleanor Schlesinger, the so-called Editor of the Washington, D. C., Herald;

And Whereas, it is shown and proven in the public records of Illinois that the said Robert R. McCormick is a coward, a liar, a cheat, a thief, a courtfixer, a free-lover, a constitution violator, an all-around scoundrel, whose private fortune of an acknowledged 16 million dollars, has been accumulated by defrauding the government that protects him, and his fellowman through "phoney" corpora-
[fol. 90] tions and other schemes devised and set up for him, in the office of the crooked law firm of Kirkland, Fleming, Green, Martin and Ellis, at 33 N. LaSalle Street, Chicago;

And Whereas, the public records show that the said Joseph Medill Patterson kicked out of his life in her old age, the wife of his youth and the mother of his legitimate children, and set up in her place, and in the place of their legitimate children, his more youthful female stenographers, and their son;

And Whereas, the long-suppressed but certified records of Cook County show that the Chicago Tribune, under the management of said grandsons of the said Joseph Medill, has stolen from the law-abiding citizens of Cook County more money than was stolen from them, during the combined administration of their grandfather and mothers, and by the use of the same dishonorable scheme;

And Whereas, the public records show that the said Robert R. McCormick has either influenced, intimidated or bribed a United States Court Judge of Chicago, in Case No. 22619, to issue a crooked order which enabled him to enter his best friend's home, to steal his wife and break up his friend's home;

And Whereas, the same public records show that the said Robert R. McCormick either influenced, intimidated or bribed Circuit Court Judges Harry M. Fisher and Joseph Burke, in Case No. 38C-3209, to issue crooked orders in a vain attempt to hide the fact, that the Chicago Tribune, under its management by the Medill-McCormick-

Patterson families, has stolen the approximate sum of [fol. 91] 100 million dollars from Cook County.

(An order by these judges based on the established law of Illinois would have forced the Chicago Tribune to trial; with the facts as they are, and the law as it is, the Chicago Tribune dare not go to trial; it would be compelled to disgorge all the stolen money; so it either influenced, intimidated or bribed these faithless judges to issue crooked order by which a trial was prevented.)

And Whereas, the same public records show that the said Robert R. McCormick either influenced, intimidated or bribed Justices Stone, Gunn and Wilson, still sitting on the Supreme Court of Illinois, to write in case 24881, an opinion more crooked than any ever written by Judge Manton of Atlanta Prison, by which Cook County's legal orderly lawsuit to compel the Chicago Tribune to disgorge millions of dollars it has stolen from Cook County, was temporarily obstructed;

(An order by the Illinois Supreme Court based on the established law of Illinois would have forced the Chicago Tribune to trial; with the facts as they are, and the law as it is, the Chicago Tribune dare not go to trial; it would be compelled to disgorge all the stolen money; so it either influenced, intimidated or bribed these faithless judges on the Supreme Court of Illinois to issue crooked orders by which a trial was prevented.)

And Whereas, the public records show that said Robert R. McCormick either influenced, intimidated or bribed the entire division of the Appellate Court of Chicago presided over by Judge Hugo Friend, to write a crooked opinion [fol. 92] in Case No. 39804, in litigation in which McCormick and his Weymouth Kirkland had a large money interest in a crooked opinion.

(An opinion of the Appellate Court based on the established law of Illinois would have compelled Kirkland to go to trial in a matter in which $100,000 was involved; Kirkland dared not go to trial; so he and McCormick either influenced, intimidated or bribed this faithless judge to issue a crooked opinion by which the trial of Kirkland was prevented; thus this cowardly Kirkland was protected, and the honest litigant against Kirkland was outraged and despoiled by the crooked opinion of a crooked judge.)

And Whereas, the public records show that said Robert R. McCormick either influenced, intimidated or bribed Judges Joseph A. Sabath and John Prystalski, of the Criminal Court of Cook County, in Cases 20981 and A40, to "railroad" to Joliet Prison and to the Cook County Jail, for the benefit of this unconscionable scoundrel McCormick, men whom the Supreme Court of Illinois records in cases 20981 and 25595 show to be innocent of the charges for which they were "railroaded."

And Whereas, by reason of the corruption by said McCormick and his crooked lawyers, of all the Courts of Illinois, from Eugene McGarry's Municipal Court up to and including Francis Wilson's crooked Supreme Court of Illinois, the combined money fortunes of the Medill-McCormick-Patterson family now amounts to the dangerous figure of 125 million dollars;

And Whereas, this swollen and dishonestly gained money fortune started by the penniless and ungrateful emigrant, [fol. 93] Joseph Medill, has descended to the third generation without the payment of a single cent of any of the legally imposed taxes, except a small one paid on the estate of Eleanor Medill Patterson; (The other sister, Katherine Medill McCormick died one of the richest persons who have died in Chicago during the last 30 years. She was born, wed and buried in Chicago. All her children were born in Chicago. Her father before her had lived for 50 years in Chicago. At his death the family home in Wheaton, where Robert R. McCormick now resides, became her home. A frequent world traveller she died sojourning in Paris, France. Her body was returned to Chicago and deposited in the Medill family plot in Rosehill Cemetery.

Before she left for her last visit to France, Mrs. McCormick made a new will. Weymouth Kirkland wrote it for her. In it she clearly stated that she was a resident of the City of Chicago; she was proud of it. Before her departure for France, she wrote to the Collector of Internal Revenue for the United States with whom she had large money transactions, a letter in which she officially gave him her address as Chicago.

When her will was offered for probate as it was in the Probate Court of Cook County, there was due from her estate to the State of Illinois, an enormous inheritance tax.

Robert R. McCormick was the executor of the will and one of the principal beneficiaries of this enormously rich estate.

Robert R. McCormick, who had been taught with his mother's milk to cheat and defraud whenever he could, determined to swindle the State of Illinois of that inheri- [fol. 94] tance tax. A politician, Harry B. Ash, "Supported" for office by the Chicago Tribune, was in charge of the inheritance tax division of the office of the Attorney General of Illinois.

Robert R. McCormick, quietly with no "publicity" appeared before that faithless politician, arose on the witness stand, took an oath to his God to tell the truth; then, lied like a horse thief; he swore that his mother, Katherine Medill McCormick, was not a resident of the State of Illinois; McCormick was followed on the witness stand by the four-times indicted Weymouth Kirkland. He also took the oath to his God to tell the truth; then, with a straight face, he, too, swore that Katherine Medill McCormick was not a resident of the State of Illinois. To curry favor with the degenerate son of a dead and defenseless client, Weymouth Kirkland, a lawyer, thus repudiated a mandate in a will which a client for reasons of her own, had paid him a large fee to insert in it.

The politician, Harry B. Ash, upon the self-serving testimony of these two dressed-up, pink-scented scoundrels, decided that Katherine Medill McCormick was not a resident of the State of Illinois. By that one-man decision, the State of Illinois was robbed of an enormous sum of money due to it, and Robert R. McCormick and his crooked lawyer, Weymouth Kirkland, were correspondingly enriched.

But, the established law of Illinois is that residence is purely a matter of intent; there is no other law. Katherine Medill McCormick, having expressed in writing, in her last will, that she was a resident of the State of Illinois, the decision of Ash to the contrary is void. The estate of Katherine Medill McCormick still owes the State of Illi- [fol. 95] nois the money due to it for the inheritance from that enormous estate; it can be collected; it will be collected with interest; fraud is never outlawed in Illinois, even when committed by Robert R. McCormick and Weymouth Kirkland, as it was in this infamous transaction

with the State that protects them and their vast property.

The facts and the evidence of the Chicago Tribune's 100 million dollar steal from Cook County and Robert R. McCormick and Weymouth Kirkland's pollution of the entire court system of Illinois, in a vain effort to hide their crimes, is even worse than it is in the above summary of the evidence, dug from actual public records.

For years, all the deacons and nearly all the members of the Puritan Church believed that the Chicago Tribune was the palladium of their liberties. Recently, by an Act of God, there was revealed to this Church, evidence from the private papers of the Medill family, that since the year 1873, while the Chicago Tribune was hypocritically shouting that it was a free press watching the "interests of the public", it was robbing Cook County of a sum of money which now amounts to approximately 100 million dollars. Every dollar of stolen money has been traced into the private bank accounts of Robert R. McCormick, the editor of the Chicago Tribune, Joseph Medill Patterson, editor of the New York Daily News, and Mrs. Eleanor Patterson Schlesinger, the editor of the Washington, D. C., Herald, and into the bank accounts of the other stockholders of the Tribune, who have become millionaires by reason of [fol. 96] the Chicago Tribune's enormous money thefts from Cook County. Before making public the cowardly crimes and the constitutional violations which the evidence reveals were committed by Robert R. McCormick, the Puritan Church submitted the evidence to the best legal authorities. All pronounced the evidence to be irrefragable; all say that for committing the crimes he has, particularly fixing crooked judges to write crooked opinions, Robert R. McCormick should be either incarcerated in an insane asylum or taken out by a posse of indignant and robbed fellow citizens, and either shot or hanged to an oak tree, as was done in Illinois when horse stealing instead of stealing money from the County was the principal occupation of gentry of the ilk of Robert R. McCormick.

His grandfather, Joseph Medill, was a typical product of the "Tragic Era" during which he lived. Base, ignorant, and selfish by nature, cunning, hypocritical and greedy by training, the midnight steal of the lease on the property of the school children of Chicago, by which the school children were deprived of penny lunches and the Medill Family enormously enriched by the fraud, was the

outstanding event of his selfish career. This deal was put through the School Board by A. S. Trude, the general counsel for the Chicago Tribune and also at the same time the president of the School Board. In 1925, the Chicago Tribune sold this lease for a profit of $6,040,000 cash, according to its own books.

A multi-millionaire at his death, Joseph Medill died, not leaving to Chicago even a book for its public library, or a plant for its public parks. His daughter, Katherine [fol. 97] Medill McCormick, was a "chip off the old block". Ignorant, penurious crass and materially ambitious, her enormous expected money inheritance from her father enabled her to marry into a socially prominent Chicago family. The influence of the Chicago Tribune and the socially prominent husband whose bills she grudgingly paid, permitted her to live in the capitals of Europe, where she could "rub noses" with "royalty", and laud it over them with her American dollars.

Her son, Robert R. McCormick, was also a "chip off the old block." He was practically brought up by cheap servants, while his mother was gadding about Europe. But he had the advantage of good schools and Yale University. There is no defense like ignorance, which his grandfather and mother had, to the crimes against his state and his fellow man, which the evidence in the possession of the Puritan Church reveals he committed, except that he is, also, insane. His only brother, Medill McCormick, was pronounced incurably insane by the celebrated alienists, Patrick, Worthy and Jung. A raving maniac, Medill McCormick had to be taken in his pajamas off a New York Central train at Syracuse and held there, in a common jail, in a padded cell, until he could be soothed. Later, he died in Washington, D. C., under circumstances in which raving maniacs usually die.

The "What a Man" letter written by McCormick; his statement that the U. S. War Department consulted him about the defense of Detroit against a friendly nation; his antics at social gatherings that he might be considered the "life of the party"; his insistence that he be [fol. 98] given the "seat of honor" at banquets, and be permitted to speak on the subject of the evening, whether or not he or his "ghost writers" know anything about the subject; the "railroads" of innocent men to prison in which he has engaged; the cowardly crimes he had wan-

tonly committed, in order to make himself a multi-millionaire; his insistence that the Police Department of Chicago ride him home in one of the department's "Squad Cars" at the public's expense; his lawsuits with his farm neighbors about trifling money matters; his attempt to "welch" on a debt of honor; his employment and close association with professional murderers, like Jack Gentleman, Mossy Enright, Gyp the Blood, Philadelphia Jack Barry, and other hoodlums and anonymous letter writers, like Al Capone and Jake Lingle, indicate that there might be a screw loose in the mental machinery of Robert McCormick, as the celebrated alienists found there was in that of other members of his immediate family.

His position as the head and control of an important newspaper which he occupies by an accident of birth; his known hatred for the Jews, the Puritans and the Negroes; his means for inciting other men against them; (he employs that self-confessed news faker, J. Loy Maloney, as the managing editor of the Chicago Tribune); his insistence that he be the political "Boss" of Illinois, and the head of the Republican Party in the U.S.; his demands that he be permitted to run an important war on two fronts, even when his ideas are counter to those of the sane West Point trained military officers of the U. S. [fol. 99] Army; his control of over 100 million dollars with the right in his obvious mental condition, to spend it as he chooses, even to the destruction of our government, compels the Puritan Church in its duty to its otherwise defenseless congregation, and to its neighboring defenseless congregations, to proceed in view of the fear of public officials of the blackmailing Chicago Tribune, to the criminal prosecution of this man, if he be sane, or his incarceration in a suitable institution, under guard, if he be insane. No orderly society can endure, in which a man who is either a criminal, or insane, insists upon the leadership of it by his inherited control of a privately owned money-making corporation called a newspaper.)

And Whereas, the public records show that all the judges who issued the obviously crooked orders and opinions for McCormick, his newspaper and his crooked law firm, were unqualifiedly advocated and re-elected by the "support" and endorsement of the Chicago Tribune, to places on the Circuit and Superior Courts of Cook County, and to the Appellate and Supreme Courts of Illinois, where they now

sit passing judgment on the lives and property of defenseless men and women who have no way in the law of Illinois, to protect themselves against the depravities which such scoundrels will commit under the cover of a court order and opinions;

And Whereas, the said McCormick has already started atrocities on the Jews, the Negroes and the Puritans, by having one of his crooked Judges write a crooked opinion under which a Puritan was "railroaded" to the Cook County Jail and held there, while unspeakable atrocities were inflicted upon him there by Howard Ellis of the [fol. 100] Notorious law firm of Kirkland, Fleming, Green, Martin and Ellis, the lawyers for McCormick in all his cowardly "railroads" of innocent men, and his thieving operations to increase his private fortune;

And Whereas, Dwight H. Green, McCormick's Governor of Illinois, by the orders of the same McCormick, has and is violating Article 5 of Section 6 of the Constitution of Illinois;

And Whereas, one Werner Schroder, McCormick's member from Illinois of the Republican National Committee, walks in and out of the back doors of the chambers of the crooked judges of the Supreme Court of Illinois, to make political deals for them and with them, and for the said Robert R. McCormick;

And Whereas, neither life nor property nor reputation, neither the Jew, Negro nor the Puritan is safe, when the Constitution of Illinois is violated, its law defied, its courts corrupted, and the elected state officials from the Governor of the State down to the policeman on his beat, who allows the "bookies" to operate, are under the domination of a man whose public record is that he is a liar, a cheat, a thief, a court-fixer, a constitution violator, a free-lover, and an all-around scoundrel, and a white-livered coward;

And Whereas, the courts of Illinois are unable to cope with the power of this corporately owned newspaper; to withstand its threats, its bribery and its blackmail; its interference in the nomination and election of judges by control of ward committeemen and county organizations, and its praise for judges who obey the orders of its [fol. 101] McCormick, no matter how corrupt such judges may be, and by its assaults upon and abuse of honest

judges, who refuse to carry out such orders, is creating a situation where the courts of Illinois are not open to the citizens of Illinois;

And Whereas, the constitution of the United States provides that no citizen shall be deprived of life, liberty or property without due process, when as a matter of fact, due to the corrupt power wielded by the said McCormick and his privately owned Tribune, citizens of Illinois have been and are denied due process of law and equal application in all cases in which the said McCormick and his newspaper or his lawyers are a partisan or interested, and the State of Illinois is denied the republican form of government guaranteed to it by the United States Constitution;

And Whereas, by reason of the power of the said McCormick and his Tribune, and their corrupt use of money, their power to frighten and intimidate public officers of said State of Illinois, including the Governor, its Legislature, and its Supreme Court, it is impossible for citizens of Illinois to have the help of such public officers in bringing said McCormick and the said Tribune before any court where complaints against them will be given a fair trial.

Now, Therefore, Be It Resolved, And It Is Hereby Resolved, that the Federal Government at Washington, D. C., be petitioned and it is hereby petitioned under the first and fourteenth amendments to the Constitution of the United States of America, to:

[fol. 102] 1. Convene a Federal Grand Jury to investigate the evidence under which each and every charge in this petition is brought; if it be true that the civil liberties of Nationals living in Illinois have been invaded by the scoundrelism that is rampant in Illinois, then,

2. Place Illinois, by the war powers conferred upon our President, Franklin Delano Roosevelt, under military rule;

3. Convene a military court, and under the rules of such a court try for the crimes which they are charged with having committed against the civil liberties of the Nationals who are compelled to dwell in Illinois, the following men: Robert R. McCormick, Joseph Medill Patterson, Weymouth Kirkland, Judges Harry M. Fisher, Joseph Burke, John Prystalski, Hugo

Friend, Joseph A. Sabath, and Justices Wilson, Gunn and Stone of the Supreme Court of Illinois. If found guilty, they should be taken out either by soldiers or a posse of civilians and shot, as a warning to other scoundrels, that our Federal Government will not tolerate the violation of a State Constitution, and the "railroad" to prison or jail of innocent men by the order of crooked judges in the hire of this scoundrel, McCormick;

4. Collect from Robert R. McCormick with interest, every cent of the inheritance tax due to the State of Illinois from the estate of Katherine Medill McCormick;
5. Collect from the Chicago Tribune with interest, every cent it has stolen from Cook County;

[fol. 103] 6. Call a Constitutional Convention in Illinois, to make a new constitution which in the future will prevent thieves from obtaining the control of a newspaper and using it to blackmail fortunes for its stockholders;

7. Re-establish in Illinois the republican form of government guaranteed to every state by the Constitution of the U. S. A., which has been destroyed in Illinois, by the illegal and unconstitutional operations of the Chicago Tribune, McCormick, Kirkland, Patterson and their crooked judges.

And, Be It Resolved, And It Is Resolved, that a Committee consisting of Conrad Miner, Charles Norris and Harrison Parker be, and they are hereby appointed to deliver this petition of our grievances to the proper United States Government authorities, and to do such other things as may be needed to prevent government of the people, by the people and for the people, being destroyed in Illinois, by the scoundrels lead by Robert R. McCormick, Joseph Medill Patterson and their notorious Weymouth Kirkland.

.....

The Appointed Secretary
of the Joint Meetings.

[fol. 104] STATE OF ILLINOIS, } ss.
COUNTY OF COOK. }

Harrison Parker, being duly sworn, deposes and says that he was the appointed secretary of the Joint Meetings of the Ecumenical Council of the Puritan Church of the United States, held at the Masonic Hall, 32 W. Randolph Street, Chicago, on August 16, 1943, and in Chicago on February 5, 1944; that Deacon William Ede presided; that the above is a true amended copy of one of the resolutions unanimously passed at said meetings.

.....

Subscribed and sworn to before me this .... day of January, A. D. 1945.

.....

Notary Public.

[fol. 105] EXHIBIT 4 TO PARKER'S ANSWER OF THE PURITAN CHURCH—THE CHURCH OF AMERICA

JANUARY 15, 1945

Hon. Francis Biddle
Attorney General of the U. S. A.
Washington, D.C.

Dear Sir:

I have been directed by the Ecumenical Council of the Puritan Church, to forward to our Federal Government their petition of their grievances. This, by its order, was held until after the recent national elections and the Christmas holiday.

Robert R. McCormick, the editor of the Chicago Tribune and his crooked lawyer the eight times indicted Weymouth Kirkland, have introduced scoundrelism into journalism, hoodlumism into the practice of law, and gangsterism into the business life of Illinois. They have corrupted the entire system of Illinois, from Eugene McGarry's corrupt Municipal up to and including Francis Wilson's crooked Supreme Court of Illinois:

Neither life nor property nor reputation is any longer safe in Illinois. The "scale" price of murder in Chicago

has been reduced to $300.00. There is strict legal evidence that Weymouth Kirkland a hoodlum, and Howard Ellis a known writer of scurrilous anonymous letters, dressed up as the "Tribune law firm" have been behind several attempted murder jobs in Chicago.

These gentlemen by the corruption of the entire taxing machinery of Illinois, and the pollution of its Courts to allow their depravities, have made it possible for the Chicago Tribune, a close private corporation, to steal from the defenseless state of Illinois, a sum of money which with penalty added, now amounts to the enormous sum of one hundred million dollars.

Our Puritan mothers took their austere babies in their religious arms and fled Europe over the ocean, to bring up on American soil their little children to obey the laws of God—come what might come to them, come what might [fol. 106] come to other men—to obey the laws of God at all times.

Anarchy is the reverse of the law of God. According to the evidence in the possession of this Church, Robert R. McCormick and his Weymouth Kirkland are anarchists, destroying "from within," the government by law, set up with the blood of the direct sires of the present members of this Church, shed at Concord, at Bunker Hill and at Valley Forge.

The local Grand Jury has been "packed" by these unconscionable scoundrels, Robert R. McCormick and Weymouth Kirkland. Access to it has been sought and refused to men and women who have strict legal evidence of every allegation made in the enclosed petition of our grievances and repeated in part in this letter, and the legal right to appear with it before a Grand Jury.

We respectfully petition our federal government to convene in Chicago a special United States Grand Jury, in charge of a special prosecutor, in order that our complaints may have an orderly legal hearing such as is guaranteed to us by the Constitution of the United States. We are,

Very truly yours, The Puritan Church, by Harrison Parker, Its Chancellor.

[fol. 107] EXHIBIT 5 TO PARKER'S ANSWER OF THE PURITAN CHURCH—THE CHURCH OF AMERICA.

JANUARY 15, 1945

The Anti Defamation League,
100 North La Salle Street
B'Nai B'Rith,
Chicago, Illinois.

Gentlemen:

The Puritans of the U. S. A. organized into their Puritan Church, would like to work co-operatively and effectively with the Jews of the U. S. A., organized into their Anti Defamation League, to protect the institutions of the existing form of government which if allowed to function naturally, and without any change, would automatically protect Jew, Catholic, Protestant, Puritan, the "laboring man", the Capitalists, as well as all other groups.

Under the form of government of the U. S. A. as it exists, could and should be Americans. There should not be groups of C. I. O.'s Manufacturers, Jews, Catholics, Protestants, Puritans, etc., which are being formed all over the country at an alarming rate. The very fact that such organizations are being organized and growing so rapidly shows that there is a general feeling that the government is no longer "a government of all the people, by all the people for all the people," as it was originally described by a Puritan Theodore Parker, and repeated by Lincoln.

The Puritan mother grimly took her austere baby in her religious arms and fled Europe over the ocean to bring up in a log cabin on American soil, her little child to obey God—come what might come to him, come what might to other men—to obey God at all times.

To do that first, and all else as incidental to that, the direct sires of the present members of this Church, set up the existing form of government, with their blood shed at Concord, at Bunker Hill, and at Valley Forge, fighting with guns along with Washington.

[fol. 108] The Puritan idea of government thus set up, is founded in human nature, and comes from the nature of God, who made human nature. To carry it out politically is to execute justice, which is the will of God. This idea,

in its realization leads to a democracy, a government of all, by all, for all.

To enjoy the shelter and the prosperity which naturally flows from such a government, the Puritans invited the Jews, the Catholics, and all other decent men and women throughout the world, to come to America and partake here of the blessings which God always sends along with His shelter and His prosperity. And they came, by the millions, and working along with the Puritans, they made the U. S. A. the most powerful nation of the whole world, and the envy of the tyrants whose shores the Jews and the Catholics and all other groups, deserted to become Americans.

Now under the name of liberalism with specious promises of securities which are impossible under a government operating under the orderly laws of God, some scoundrels, some agitators, some self-styled editors, some wolves in sheep's clothing, some men insane from indulgence in the rich food and the luxury, which always flow from an orderly government, are attempting with cockeyed ideas on government, to destroy the form of government set up by the Puritans.

These, and their ideas the descendants of the original Puritans in the 10th generation born on American Soil, and still members of this Church, will oppose even if it be necessary to spill more blood on American Soil.

The law abiding, peace loving Jews have as much of a stake in maintaining the existing form of government in the U. S. A. as the Puritans have. Therefore, this Church is writing this letter to you, to invite you to work co-operatively and effectively with it, for our mutual self-protection and for the mutual protection of our children and our homes.

In our previous letter to you, we stated that this Church had indisputable evidence that the Chicago Tribune, by a violation of the Constitution of Illinois, by a defiance [fol. 109] of the law passed by her legislature, and by the corruption of the entire court system of Illinois from Eugene McGarry's corrupt Municipal up to and including Francis Wilson's crooked Supreme Court of Illinois, had stolen from the defenseless State of Illinois, a sum of money which with penalty and interest added now amounts to the approximate sum of 100 Million Dollars.

That one part of the stolen money had been checked out by the Tribune Company to its greedy multi-millionaire stockholders as cash dividends, at the rate of 500% per month, on an invested capital of $200,000, and the other part had been invested in a "Canadian Empire" that is now appraised at 50 Million Dollars cash.

That the steal was accomplished by the open notorious cowardly and illegal connivance between the Tribune Company, the owners of the Chicago Tribune, and two Jews: one Harry M. Fisher, a Judge of the Circuit Court of Cook County; and the other Jacob Shamberg, the Assistant State's Attorney of Cook County.

That both of these gentlemen had been paid a large salary by the State, to protect the State, and both according to the evidence in our safe deposit vault had in order to gain the favor of the thief, the Chicago Tribune, had criminally sold out the State which they had been paid to protect.

That this Church intended to compel the Chicago Tribune to disgorge every cent of the stolen money, and drive both Harry M. Fisher and Jacob Shamberg off the public pay-roll and into the obscurity that both had merited by their venal conduct in State affairs.

That strict legal evidence of the disgraceful conduct of both these gentlemen now in the possession of this Church, was open to your lawyers.

That if the evidence in the opinion of your lawyers were not perfect, this Church would proceed no further; that if it were perfect, this Church desired the Anti Defamation League to stand by its side, in the fight it intends to make on all concerned, in this outrage on our government, if for no other reason than to prevent the fight on [fol. 110] these men being called a fight against Semitism.

Your answer to that letter addressed to the Anti Defamation League is here quoted:

"I have referred this matter to our Director, Mr. Gutstadt, who desires that I advise you that this does not fall within the preview of the Anti Defamation activities, and we therefore will be unable to be of service to you.

Very truly yours, Stanley S. Jacobs."

Notwithstanding this curt personal answer of the individual and unknown Mr. Jacobs to an important letter

addressed to your League by this Church, the Puritan Church still desires to work co-operatively and effectively with the Jews, to protect the existing form of government for them as well as for the Puritans and all other law abiding and peace loving groups.

The theft of a 100 Million Dollars from the State, by the Chicago Tribune, is a small matter compared with the pollution of the Courts of Illinois which Robert R. McCormick, the Editor of the Chicago Tribune, personally ordered in a vain attempt to hide the enormous steal.

The Courts under the form of government set up by the Puritans, are the last bulwarks of our Liberties. When they can be corrupted as the record shows they have been, by the named men, neither Jew, Catholic, Protestant nor Puritan is any longer safe; life and reputation are in danger, and property is not worth the efforts to accumulate it; all are held at the sufferance of the scoundrel who can and will corrupt the crooked Courts.

It is the opinion of our trustees, that in our previous letter, we did not adequately describe the evidence in the possession of this Church, which it intends to use in a national fight against the corruption existing in the Courts, whether the organized Jews fight side by side with it, or whether they fight against it. Here is the complaint of the Puritan Church:

[fol. 111] The public records of Illinois show that for 66 consecutive years the Chicago Tribune violated the Constitution, defied the law passed by her legislature, and corrupted the public officials and the Courts to aid it in its enormous steals.

When the evidence of its crimes were discovered and presented to Jacob Shamberg, the Assistant State's Attorney, responsible for the prosecution of such crimes, he refused to act. With the identical facts and identical law, he proceeded against the Pioneering Tailoring Company, which had committed against the State of Illinois, the same crime which the Chicago Tribune had. From the Pioneering Tailoring Company, he recovered for the defrauded State of Illinois, every cent of the stolen money; there was less than $20,000 involved in its steal, while there was 100 Million Dollars involved in a like steal by the Chicago Tribune.

When Shamberg refused to act against the politically

powerful thief, the Chicago Tribune, a taxpayer filed a lawsuit to compel — to disgorge its loot. Then, Shamberg joined the Tribune lawyers in attacking and slandering the brave citizen. And he made before the Courts obviously crooked motions aimed to illegally defeat the State and aid the Chicago Tribune to cover its steal.

One of these crooked motions was made by Shamberg before Judge Harry M. Fisher, before referred to, in case 38-C-3209.

The illegal order issued by Fisher in that case at the request of Shamberg, to swindle the State which paid both Fisher and Shamberg to defend it, was more crooked than any ever issued by Judge Manton of Atlanta Prison.

This Church has a certified copy of Shamberg's crooked Motion and Fisher's crooked order; no Court of final jurisdiction has ever upheld a single one of Shamberg's crooked motions, or Fisher's crooked order; these will be submitted to your lawyers. If they do not agree in what we say about them, this Church will proceed no further in this matter. If they do agree, the Anti Defamation, as well as [fol. 112] every other League of good citizens, should be fighting with the Puritans.

This order of the faithless Fisher in this litigation, appealed to the Supreme Court of Illinois, was so crooked that the entire Supreme Court of Illinois, had to be either influenced, intimidated or bribed by the Chicago Tribune to write a crooked opinion in case 24881, reported in 370 Illinois Supreme at page 243, in a vain attempt to cover Fisher's judicial depravity; it is so crooked that even a corrupted Supreme Court cannot cover it, even with adroit language; it could not end the litigation as it was corrupted to do; a cause of action still remains.

If your lawyers will read this record and report, after examining it, that it is not as vile as we have carefully described it, this Church will proceed no further against either Fisher or Shamberg. If your lawyers do report that it is as vile as we have described it, then the Anti Defamation League cannot afford not to co-operate with the Puritan Church in its determination to clean up the crooked courts. Such courts are as much a menace to the Jews as they are to the Puritans; a crooked Jew Judge is as dangerous a foe to law and order and humanity, as a

crooked Puritan, a crooked Protestant, or a crooked Catholic Judge.

Yes, the public records show that Robert R. McCormick, the Editor of the Chicago Tribune, is an all around scoundrel; he and his family under the constant plea for more "freedom for the press," have stolen from the State which protected them, more money than was stolen by the Tweed gang of New York, the Pendergast gang of Kansas City and the Kelly gang of Chicago; the Medill McCormick fortune is the filthiest fortune ever accumulated in the U.S.A., according to the public records.

Yes, the Chicago Tribune is a powerfully entrenched privately owned and corrupt newspaper.

Yes, the Chicago Tribune has on hand a surplus of more than 100 Million Dollars stolen from the State of Illinois, which it does not hesitate to use to destroy men who are brave enough to call it from Court records a menace to our form of government. And Robert R. McCormick, who [fol. 113] has the stock control of it, a thief, a liar and a court fixer.

Yes, Robert R. McCormick has been the employer and business associate of hired assassins like Mossy Enright, Jake Lingle, Jack Gentleman, Philadelphia Jack Barry and other gangsters and murderers.

Yes, Robert R. McCormick employs as his general counsel the eight times indicted Weymouth Kirkland, who has also been the General Counsel for Moe Annenberg and other thieves, law-breakers and thugs; he is not allowed to practice law in the Courts of New York State. In the Appellate Court in file 39804, there is proof that this Kirkland is a common hoodlum dressed up as a lawyer.

Yes, Robert R. McCormick employs as the Managing Editor of the Chicago Tribune, the self-confessed "news faker" J. Loy Mahney; no government, no man, no property is safe with a news faker in charge of the news department of a daily newspaper.

Yes, Robert R. McCormick introduced scoundrelism into journalism, hoodlumism into the practice of law, and gangsterism into the business life of Illinois.

Yes, in Chicago now dominated in all departments of its government by men personally selected by Robert R. McCormick and bally-hooed into office by the dishonest praise of his corrupt Chicago Tribune, the "scale" price of mur-

der is $300. Any Jew, any Puritan, at any time, can be murdered on the Streets of Chicago and the murderer will go unpunished for $300. This Church possesses the evidence of the "scale" price, and it has strict legal evidence that since the "scale" price of murder was now dropped within the reach of all, the Tribune law firm founded by Robert R. McCormick, has tried several little "murder jobs," and has "railroaded" at least one innocent man to Joliet Prison where he was held for 8½ years, and at least one innocent man to the Cook County Jail, where he was held until the cowardly and unscrupulous Weymouth Kirkland uninvited, personally called at the Jail and there released the outraged man, as easily as he [fol. 114] had been locked there by the Tribune law firm, in a vain attempt to blackmail him to dismiss an orderly legal lawsuit, which he had courageously filed against the blackmailing, law breaking, Constitution violating Chicago Tribune.

With these facts before them and a proffer of strict legal evidence to substantiate each and every allegation carefully made in this letter, we do not know what the Anti Defamation League of the B'Nai B'Rith is going to do. But we know what the Puritan Church is going to do. It is going to fight to restore and maintain in the U.S.A. the orderly law of God, as it is expressed in the Declaration of Independence, in the Constitution of the U.S.A. and in the hearts of all decent men and women. And it is going to ask every man and women in Illinois, with either property, children or any other stake in the preservation of orderly peaceful government, to uphold it in spirit, if not with money, as the Anti Defamation League is upheld by the money contributions of the Jews, to end the anarchy that now exists in Illinois, with Judge Harry M. Fisher on the Circuit Court of Cook County, and Jacob Shamberg as the Assistant State's Attorney of Cook County.

If the "activities" of the Anti Defamation League are combined, as Mr. Jacobs intimates in his curt letter, to merely protecting the Jews, even when they are engaged in destroying "from within" the institutions of government which should protect all of us, it is time to widen its "activities," to protect the government which would automatically protect the Jews, if the Jews would join the Americans and compel it to function as it is outlined in

the Declaration of Independence, in the Constitution of the U. S. A. and in the hearts of all decent men and women. We are,

Very truly yours, The Puritan Church, by Harrison Parker, Its Chancellor.

[fol. 115] EXHIBIT 6 TO PARKER'S ANSWER OF JANUARY 15, 1945.

THE PURITAN CHURCH—THE CHURCH OF AMERICA

December 20, 1944

The Illinois League of Women Voters,
225 North Michigan Avenue,
Chicago, Illinois.

Dear Mesdames:

This Church would like to work co-operatively and effectively with you, to amend the Constitution of Illinois. It can be re-written, only if the fight necessary to accomplish it, be around the depravities which the millionaire stockholders of this Chicago Tribune have committed, under the present Constitution.

There is in the possession of this Church, strict legal evidence that by a violation of the Constitution of Illinois, for 66 consecutive years, the Chicago Tribune stole from the defenseless State of Illinois a sum of money, which with interest and penalty added, now amounts to the approximate sum of 100 Million Dollars.

In a vain attempt to hide this enormous steal, the Courts of Illinois from Eugene McGarry's corrupt Municipal up to and including Francis Wilson's crooked Supreme Court had to be either influenced, intimidated or bribed to ignore the Constitution of Illinois and defy the law passed by her Legislature.

One part of the stolen money was paid out by the Chicago Tribune to its multi-millionaire stockholders, as monthly cash dividends at the rate of 500% per month on their invested capital of $200,000: the other part was used to acquire a "Canadian Empire" which is now appraised at 50 Million Dollars.

The corporate surplus of the Chicago Tribune is over 100 Million Dollars; every cent of this would be used by the Chicago Tribune, if necessary to defeat any change in the present Constitution which has permitted it, with the connivance of crooked Judges, to steal the money it now has. All this evidence is available either to your lawyers, [fol. 116] or to you in open meeting to which the Chicago Tribune should be invited to attend.

The 20 odd Chicago Tribune stockholders do not want an income tax in Illinois; therefore, their privately owned newspaper will oppose you, and defeat you, unless you determine that the interests of the State are above the interests of the multi-millionaire stockholders of the Tribune. By hypocritically concealing its private interest behind a plea of a public interest, the tax thieves who have had the control of the Chicago Tribune, for three generations have defeated every attempt made by the decent persons of Illinois, to re-write its antiquated Constitution.

The seemingly public spirited editorial printed in today's Chicago Tribune, is a sample of the dastardly and cowardly influence which you and all other decent citizens must fight, if Illinois is to be rescued from its jungle state.

Under the specious plea, that it is protecting the interests of the "boys at the front," the Tribune cunningly says, the Constitution must not be amended in their absence. Yet the records of Illinois show that while the "boys" were at the "front" in 1918, the Chicago Tribune stole from the State of Illinois, 12 Million Dollars, which it transferred to its stockholders as cash dividends. While "our boys" are at the "front" now, the Chicago Tribune with the connivance of the Kelly-Nash machine which it keeps in power, has stolen another approximate three million dollars.

A fight to re-write the Constitution will again end in naught. But a fight on the Constitution violations of the multi-millionaire Chicago Tribune, will as a "cushion spot," cause a public indignation which will result in the re-writing of the Illinois Constitution. Your organization having undertaken the task which it has, will lose its influence, unless it accomplish what it has undertaken.

We trust that you will send your counsel to view the evidence to which we have referred in this letter. If it be [fol. 117] what we assert it is, we also hope that you either

work co-operatively and effectively with us, or you permit us to work co-operatively and effectively with you.

Very truly yours,

The Puritan Church:

By:

Harrison Parker, *its Chancellor.*

On January 15, 1945, the defendant filed the following petition for a rule upon Parker to show cause:

PETITION FOR RULE TO SHOW CAUSE.

Now Comes The Defendant, Jacob Shamberg, by Kirkland, Fleming, Green, Martin & Ellis, his attorneys, and represents to the Court as follows:

(1) That one E. E. Wenger, a notary public, (after notice duly served by this defendant on the plaintiff) issued Notary's subpoenas duces tecum, directed to one Elmer Benton and one Agnes Richardson, commanding them to appear before him at Room 3200, 33 North LaSalle Street, Chicago, Illinois, on February 21, 1944, at 2 o'clock p. m., and further commanding said Agnes Richardson to bring with her certain books and records of the so-called "Puritan Church," once the so-called "Brotherhood of The Ancient Order of St John"; that at the time and place aforesaid neither of said witnesses appeared before said Wenger; but Harrison Parker, plaintiff in this action, did appear before said Wenger and, acting as counsel pro se, stated that said witnesses would not appear to tes- [fol. 118] tify; all as appears from the petition of said Wenger duly filed in this cause on February 25, 1944.

(2) On February 23, 1944, said Parker duly filed in this cause a petition under oath, reciting in substance the issuance of said subpoenas as set forth in Paragraph 1 hereof; and further stating:

> "* * * that the records of said [Puritan] church are not material to the issues of this cause * * * and praying that an order may be entered herein restraining the Puritan Church of La Grange * * * from producing any papers, books or records before E. E. Wenger, a notary public of Cook County, Illinois, without having first obtained an order of this court so to do."

Said petition was sworn to by said Parker.

(3) On February 28, 1944, said Benton and Richardson appeared before said notary, Wenger, to give their depositions, but refused, after objections by said Parker [acting as counsel pro se], to answer numerous questions directed to them by this defendant's counsel; that during the course of said examination said Richardson was asked by this defendant's counsel whether she had brought with her the books and records of said so-called "Puritan Church" called for in said subpoena duces tecum theretofore served on her; whereupon the following transpired:

"Q. Did you bring the papers with you?

A. I didn't know I was supposed to bring them.

Mr. Parker: Q. Have you got them?

A. I think I have got them.

Q. Listen, Doctor, have you got any records of the Puritan Church called for in this paper?

A. No. He is talking about these papers.

Mr. Bates: The things called for in the subpoena.

[fol. 119] Mr. Parker: Q. Have you any records of the Puritan Church in your possession?

A. Mr. Parker, will you please be calm. Mr. Parker, he is referring to the subpoena papers. On the back of the subpoena papers there were questions pertaining to this nonsense you are going over. It was irrelevant to the case. There was not a thing about the remarks Mr. Shamberg made. It was all irrelevant, and I didn't think, on constitutional grounds that I should be there.

Mr. Martineau: Q. Are you an attorney?

A. No, I am not an attorney, but I do have a divine in me that guides me once in a while.

Q. Divine what?

A. Divine spark that guides me once in a while, I hope.

Q. In order to get this straight, you say there were some questions on the back of this subpoena that was served on you?

A. Mr. Martineau, you have that subpoena. I may be wrong. On the back of that subpoena paper there were some questions you asked me to bring in, you understand.

Q. It was a subpoena duces tecum.

A. Mr. Martineau I don't know the terms, you see, for these papers.

Q. Let us get it straightened out so that we don't have anything wrong in the record. In other words, what we call a subpoena duces tecum was served on you?

A. Yes.

Q. Requiring you to come and testify, also to bring some records of the Puritan Church.

A. That is what I am referring to.

Q. Do you have those records in your possession?

A. Mr. Martineau, I am not going to say. I think I may have them at home.

Mr. Parker: Q. Doctor, have you any records of the Puritan Church at your home?

A. He asked me about the subpoena papers. How could I have anything? I have no records of the Puritain Church.

Mr. Parker: You are talking about the subpoena papers?

[fol. 120] Mr. Martineau: No, I am talking about the papers called for in the subpoena.

A. Oh, no, you are talking about the subpoena papers.

Q. No, I am talking about the papers described in the subpoena.

A. Oh, no.

Mr. Martineau: That straightens it out for you?

Mr. Parker: Yes.

Mr. Martineau: Q. Did you ever have any papers such as described in the subpoena in your possession?

A. I refuse to answer. I have not, but I refuse to answer.

Q. You haven't, but you refuse to answer?

A. Yes.

Q. Well, which is it??

A. I refuse to answer.

* * *

Q. Do you remember when you looked at that subpoena served on you, that you saw that it asked you to bring certain records?

A. Yes.

Q. Let us get it straightened out.

A. Now, you are getting straight.

Q. It called for you to produce certain records of the Puritan Church.

A. Yes.

Q. As you looked at that paper the first time it was served on you, did you at that time have any of those papers in your possession?

Mr. Parker: Of the Puritan Church?

Mr. Martineau: Yes.

A. I had no papers.

Q. Of the Puritan Church?

A. Positively not.

Q. Did you ever have any of those papers in your possession?

A. No.

Q. Never in your life?

A. Never."

(4) On or about March 1, 1944, said Parker duly filed a second sworn petition in this cause reciting:

"* * * that the defendant herein * * * has served a subpoena upon Elmer L. Benton and Agnes Richardson to appear before this court or before E. E. Wenger, [fol. 121] a notary public of Cook County, Illinois, and produce said records pertaining to the Puritan Church of La Grange, Illinois, The Brotherhood of The Ancient Order of St. John, and the Order of Kyria, and that said subpoena was served without a petition being presented to this court; * * * that Elmer L. Benton, Agnes Richardson, The Puritan Church of La Grange, Illinois, The Brotherhood of The Ancient Order of St. John, and the Order of Kyria are not parties to the above entitled cause and that the records of said parties, church, and organizations are not material to the issues of this cause * * *."

and said Parker prayed in said petition that the defendant and his attorneys be restrained from proceeding in taking said depositions and from "demanding from either or both of them [Richardson or Benton] any records of the above named religious corporations * * *"; said petition was verified by the oath of Parker.

(5) On March 2, 1944, in a hearing held in open court before the Honorable Cornelius J. Harrington, Judge, in connection with the above mentioned matters, the following occurred:

> "The Court: The records of the Puritan Church and the Order of St. John are they in the State of Illinois?
> Mr. Parker: No, sir.
> The Court: Where are they?
> Mr. Parker: I think they are both in St. Louis at the present time.
> * * *"

(6) On March 22, 1944, defendant duly filed the verified petition of said E. E. Wenger, reciting the refusal of said Benton and Richardson to answer questions at the taking of their said depositions, as set forth above in Para- [fol. 122] graph 3 hereof; and reciting further the issuance of said subpoena duces tecum requiring said Richardson to bring with her said books and records of said so-called "Puritan Church" and said so-called "Brotherhood of The Ancient Order of St. John."

(7) On the same day, March 22, 1944, this defendant duly filed in this action a second verified petition reciting in substance that said Parker had admitted that said Richardson was the so-called "Chancellor" of said so-called "Puritan Church"; that the records of said so-called "Puritan Church" were material in this cause for the following reasons:

> "(a) Your petitioner is informed and believes that Parker formed the so-called 'Puritan Church' as a means to carry on certain extortion operations and giving his activities an aura of legality.
>
> (b) Parker has admitted in his deposition that the contributions received by the 'Church' were to be used to carry on its campaign to shoot or hang all alleged 'constitutional violators.'
>
> (c) Parker has testified that a church can say or write anything about any one by virtue of the constitutional provisions as to freedom of religion.
>
> (d) Parker has testified that a church is 'legal' as long as it can be shown that it has 'solaced one soul.'

(e) Parker has produced letters from people who have purchased so-called religion from the 'Puritan Church,' most of which enclosed contributions.

(f) In a deposition said Parker has identified over 1100 letters and pamphlets, written, mailed and published to various persons, firms and corporations containing threats to expose the alleged shortcomings and [fol. 123] threats to kill and harm a larger number of persons, firms and corporations, including numerous judges and public officials whom Parker has listed as 'constitutional violators.' Many of said letters have been written by the 'Puritan Church' and signed by Parker as a purported officer thereof and are of similar language to those admittedly written by Parker himself.

(g) In a deposition Parker stated 'the Puritan Church is going to try to hang.....and....., (here he names two prominent citizens) and this Jew .....(naming a respected judge of the Circuit Court of Cook County) and the Jew....., (naming a respected judge of the Appellate Court) and some of the men of the Supreme Court who have written crooked opinions.'

From the foregoing your petition believes that the 'Puritan Church' is either in conspiracy with said Parker or is merely a sham designed by said Parker in an attempt to surround his attempted extortions with an odor of sanctity; that the books and records of the 'Church' will tend to prove the allegation in the answer that said Parker is a blackmailer."

and this defendant prayed for an order for a subpoena duces tecum directed to said Richardson to appear and give her deposition and to bring with her all books and records in her possession or control pertaining to said so-called "Puritan Church."

(8) On October 2, 1944, at 10 o'clock a. m., (pursuant to an order of this court duly entered on August 25, 1944) said witnesses, Richardson and Benton, appeared before said notary, E. E. Wenger, at Room 3200, 33 North LaSalle Street Chicago, Illinois, and again refused to answer said interrogatories directed to them by counsel for the defendant; after which said Richardson was examined

[fol. 124] by said Parker, acting as counsel pro se, and the following transpired:

"Q. Doctor, have you in your possesion at this time any books or papers or any documents of any kind or character connected with the Puritan Church?

A. I refuse to answer.

Q. Now, wait a second.

A. What was the question?

Q. Have you in your possession now any records or any papers or contracts or any documents connected with the Puritan Church?

A. Connected with the Puritan Church, yes.

Q. What have you got?

A. Well, I don't think I should go into that now.

Q. Yes, I think you should, Doctor. What have you got connected with the Church?

A. I have papers of the trustees, and so forth.

Q. What is that?

A. Papers regarding the Puritan Church.

Q. Where did you get them? Are you sure that you have them?

A. I have some papers.

Q. Of the Puritan Church?

A. You are referring to the Puritan Church?

Q. Of the Puritan Church?

A. I thought you said literature.

Q. No.

A. I haven't anything pertaining to the Puritan Church. I have some literature.

Q. That is right.

Mr. Bates: Some what?

A. Literature.

Mr. Parker: Q. Have you any time ever had in your possession any of the records of the Purtain Church? I don't mean its literature. I mean its records?

A. No, I have not.

Mr. Parker: O. K.

Mr. Bates: Why don't you ask her where they are?

Mr. Parker: Because I know she doesn't know.

The Witness: Literature?

Mr. Bates: No, records.

[fol. 125] Mr. Parker: Because I know she doesn't know, so why should I ask her? Why should I ask her

a lot of foolish questions? This woman has been tortured with a lot of foolish questions for an hour. I know she does not have any of them in her hands and she doesn't know where they are."

That after the examination of said Richardson by said Parker, said Richardson was again examined by counsel for the defendant and the following transpired:

"Q. Now, as to those papers which you testified to on Mr. Parker's examination, papers of the Puritan Church, let us get that straight, which list of papers or records belonging to the Puritan Church are or have been in your possession?

A. I refuse to answer.

Q. You answered Mr. Parker, didn't you?

A. I said literature.

Q. What papers or records——

A. Literature I thought he said.

Q. You never had any papers or records of the Puritan Church?

A. No, sir, I meant literature.

Q. Did you ever have any letters or correspondence addressed to the Puritan Church?

A. I refuse to answer.

Q. In your possession?

A. I refuse to answer."

(9) On October 18, 1944, there was duly filed in this court the verified petition of E. E. Wenger, praying that a rule to show cause issue against said Richardson and said Benton for their refusal to answer the interrogatories as set forth above in Paragraph 8; that an order was entered requiring said Richardson and said Benton to file within ten days their answer to said petition and setting the hearing of said rule to show cause and answers thereto for November 22, 1944.

[fol. 126] (10) On November 10, 1944, said Richardson and said Benton filed in writing their joint answer to said rule to show cause; and on November 22d and on November 24th said matter was duly continued until December 4, 1944.

(11) On December 4, 1944, said matter came on for hearing on the rule and the answer thereto in this court

before the Honorable Daniel P. Trude, Judge; and said Richardson testified under oath in open court that on August 2, 1943, she had certified in a certain document that she was the "duly elected and qualified Chancellor of the Congregation of the Puritan Church, a corporation organized and existing under the laws of Illinois, and the Keeper of its Records and Corporate Seal"; and when asked whether or not, according to said last mentioned document, she was "the Keeper of the Records of the Puritan Church," the following transpired:

"A. I am the keeper of some records.

Q. Here, by this resolution, "Keeper of all the records."

A. Well, there may be records I know nothing about."

When asked where said records of said Puritan Church were kept, said Richardson testified as follows:

"A. They are kept in the— I think— I don't know. I think there may be some in the office.

Q. There may be?

A. I am not sure now. I don't know.

Q. Well, as Chancellor, have you ever taken the occasion to see whether or not there are any records of the Church in the office?

A. I have only certain responsibilities, and I mind my own business.

* * *

[fol. 127] Q. Now, the question is, Doctor, have you, as Chancellor, ever taken the occasion to see if there are any records of the Church at 11 South La Grange Road?

A. There are some records there.

Q. There are some records there?

A. Yes.

Q. The others, you feel, are kept by these three trustees whom you have named?

A. I presume there are some records.

Q. Does Mr. Parker keep any of the records?

A. I don't know a thing about Mr. Parker.

Q. Is there any book anywhere recording the resolutions of the Puritan Church or its Ecumenical Council?

A. I don't know.

Q. You have never taken the occasion to find that out?

A. No, sir."

When asked to name the Board of Directors of the Puritan Church, said Richardson testified as follows:

"A. Mr. Norris, Mr. Miner and Mr. Race.

Q. Were they present at that meeting on July 15th, 1943?

A. I don't know, I couldn't say. I don't recall.

The Court: The minutes would show, wouldn't they?

Mr. Martineau: Q. Is that recorded in the minutes, such a meeting as that?

A. I presume so.

Q. Do you have those minutes in your possession?

A. I don't recall. There are so many papers, I told you I cannot just offhand simply say 'yes' when I am not sure of myself."

Thereupon the following transpired:

"The Court: Will you check your records and try to remember whether you were the keeper of such records? Check the records such as you have, and give us the answer the next time you come into court. [fol. 128[Mr. Guidarelli: Is there going to be a next time?

The Court: Yes. Now, the question is who were the trustees on July 15th, 1943.

Mr. Martineau: The trustees and board of directors.

The Court: The trustees and the board of directors according to your minutes. Now, you not only have access to the records, you were the keeper of the entire records.

* * *

Mr. Parker: Your Honor, may I help the Court? In one little suggestion, I can help the Court.

The Court: I wish you would.

Mr. Parker: The records which you have ordered this lady to bring in, the addresses of the trustees, and the minutes, and so forth, are in Canada, where

they have a perfect right to be. The Church's trustees have ordered all the records to Canada.

The Court: Tell them to order them back here again.

Mr. Parker: They won't, your Honor. I didn't want to get into any trouble. They have been there since the starting of the lawsuit.

The Court: If these records are in Canada, order them back here, and if you or Mr. Benton have any access to these records or control over them, order them back here.

Mr. Parker: I haven't any.

The Court: Haven't you, Mr. Parker?

Mr. Parker: No, I haven't.

The Court: Somebody has.

Mr. Parker: The trustees have them. They are in Canada. There is no way that this lady or Mr. Benton or myself can bring them back.

The Court: All right.

Mr. Parker: I don't want this lady to come into court later on and tell you that, for fear you might think that that was not so.

The Court: When did these records leave the jurisdiction of this court?

[fol. 129] Mr. Parker: When this law firm——

The Court: Since the starting of the lawsuit?

Mr. Parker: No, before that."

(12) Further in said proceedings, on December 4, 1944, before the Honorable Daniel P. Trude, said Parker interrupted the examination of said Richardson and volunteered a statement to the court; whereupon, having been first duly sworn, said Parker testified in part as follows:

"Now, the Ecumenical Council of the Puritan Church, of which neither Dr. Richardson or Mr. Benton are members, met in the Masonic Temple in 1942, and decided to go after the courts of the United States. That is the order of the Ecumenical Council, and they agreed to start with the Supreme Court of Illinois, and to impeach or attempt to impeach some of the judges in the nisi prius courts. That was all ordered by the Ecumenical Council.

• • • •

I am high in the councils of the Church. I am proud of it. No doubt they are proud of me or they would not have nominated me. We have been in conflict with Colonel McCormick and his whole firm. The trustees removed all the records of the Church when we found out that we were in controversy with these people. These records are today in Canada, and the trustees have not been served in this lawsuit.

Now as I understand the law, to get the records of that Church, they have got to come into this court and ask for a court order, and in that court order they have got to set up, not a theory, as they are putting forth here, they have got to set up that these records are essential, and this Court has to issue an order, which would be an appealable order.

In my opinion, no court, no upper court, and in fact I don't think this court would ever issue an order to bring in records of the Church. If that were done, [fol. 130] the courts could supervise all churches, which they cannot do.

* * * *

Now, as I understand it, your Honor, if they want the records of the Church, they have got to come here and get a court order, and they have got to set up in the court order or petition that the records are necessary, and then you have got to issue the order. That has not been done, so it is a fishing expedition, pure and simple.

For instance, one question here which Mr. Benton answered clearly: "Did you turn over large sums of money to Harrison Parker?" They knew that Mr. Benton hadn't. Of course Mr. Benton said no. It shows the character of this examination. It is a fishing expedition to try to slur the Church. Now, the Church is not worried the least bit about it, not the least bit. Every question they want to ask about the Church could be answered if they wanted to do it, and the Church has some dignity and some honor, and it is not going to let Colonel McCormick or Weymouth Kirkland go into the records, which the law provides against."

and on cross-examination by counsel for the defendant said Parker testified in part as follows:

"Q. Now, when did you say that the trustees ordered the records taken to Canada?

A. Let me see. I can give you the exact date. Sometime in the year 1941.

Q. And they have been there ever since, all the records of the Church?

A. Oh, yes, the records of the church, the minute books and all the records of the Church are in Canada.

Q. Where in Canada?

A. Well, the place is on Redpath Road. I don't know the address right now.

Q. Is the address recorded anywhere in Chicago?

A. No, it is not. The legislature provided against it and it is not.

Q. In the possession of what individual are the records?

[fol. 131] A. They are in the possession of one of the trustees.

Q. What is his name?

A. Mr. Norris is the name of the Trustee.

Q. Does Norris live near or in Montreal?

A. I don't know.

Q. Are you the Chancellor of the Church now?

A. I am Chancellor of the Puritan Church, the main church. I am Chancellor of the Puritan Church. I was elected to that. I was honored by the church of my father.

* * * *

Q. Now, what is your position in this hierarchy?

A. I am right now in charge of preparing indictments for the impeachment of Judge ——— and Judge ———. I am in charge of the political end of the Church right now.

Q. You are in charge of the political end?

A. Yes, sir.

Q. Do you hold any office in the Church?

A. I am Chancellor of the Church.

Q. You are supreme?

A. No, the Ecumenical Council is above me.

Q. Now, let me get this. This interests me.

A. I should think it would.

Q. You now answer under oath that the records of the Puritan Church have been in Canada since 1941?

A. Since 1941.

Q. Have you ever testified to the contrary?

A. I don't think so.

Q. Let me refresh your recollection. When you gave this deposition, did you make this answer to this question——

A. I think at one time they were in Milwaukee.

Q. Yes. When you gave your deposition in January and Februa in this case, did this occur, Mr. Parker? You were asked this question about some records and by-laws and so forth:

'Q. In other words, all the records of the Puritan Church and the orders generally are out of the state of Illinois?

'A. They are.

[fol. 132] 'Q. They are in the state of Wisconsin somewhere?

'A. They are.'

A. That is right.

'Q. Are they in the city of Milwaukee?

'A. I won't answer that.'

A. Yes, sir, that is right. They were in Milwaukee at one time. They were in the hands of their lawyer.

Q. Then when you say they were in Canada since 1941——

A. No, they send them from place to place.

Q. Who are the trustees?

A. The trustees at the present time, I don't know who they are.

Q. You don't know who they are?

A. I don't know who they are right now.

* * * *

Q. Now, isn't it a fact that to your knowledge and at your behest, contributions received by the so-called church are used to—isn't it a fact, Mr. Parker, that moneys received by this so-called Puritan Church are used for the purpose of printing letters and pamphlets suggesting that certain persons whom the Church claims have violated the constitution, including judges, should be hanged?

A. These contributions are made by individuals for that purpose. The general funds of the Church are not used for that purpose. There is a special fund to which some very rich men have contributed to bring indictments against the court system of Illinois. They received checks or money, thousands of dollars, for that purpose. There are some men who are very much interested in our situation out here.

Q. Have you ever testified to the contrary?

A. I don't think so.

Q. Now, I notice here the Church says it is going to use the funds it is going to get by contributions to impeach ..... and ..... and Justices ..... and ..... for the crooked opinions they have written in the Tribune litigation. Then the question is: 'Is it going to do that now?' and did you answer: 'Yes, sir'?

[fol. 133] A. Yes, sir, I answer the same thing here today. Those contributions are a special fund. It is not the general fund of the Church.

Q. How much has been received in that fund?

A. For the indictment of the judges?

Q. Yes.

A. They have got about $14,000 now.

Q. Who contributed that money?

A. I don't remember all the names.

Q. Did you handle the money?

A. No, sir.

Q. Who did?

A. The trustees.

Q. What trustees?

A. The trustees in Canada.

Q. Do they get the money in the United States and take it to Canada?

A. I think it was mailed to them.

Q. Were you present when it was mailed?

A. No, sir.

Q. How do you know it was mailed?

A. I don't know, I think so. I know they got the money.

Q. Did anybody tell you it was mailed to them?

A. I don't think so. They told me they had the funds and told me to proceed.

Q. Who told you that?
A. Mr. Race.
Q. Where?
A. I don't remember that.
Q. Did he tell you by letter?
A. No, he told me personally.
Q. In person?
A. Yes.
Q. In what city?
A. I don't remember that.
Q. When did he tell you that?
A. I don't remember that.
Q. Who was present when he told you that?
A. I don't think anybody was.
Q. Just you and he?
A. Yes.
Q. Do you have any idea when he told you?
A. No. I know we have been working on it since 1941. We have been after the courts here.
Q. Did he tell you he had received $14,000 for that purpose?
A. $14,000 for that purpose.
Q. Did he tell you where he had gotten it from?
A. No, sir.
Q. And you didn't ask him?
A. No, sir. Why should I?
[fol. 134] Q. Did you ask him where the money was?
A. No, sir.
Q. You were not concerned at all?
A. No, I am not concerned. I know we are proceeding to do that, and are spending the money.
Q. Who is spending the money?
A. Some of it passed through my hands.
Q. How was it passed through your hands?
A. In currency.
Q. Always in currency?
A. Yes.
Q. When was the last time you received currency for that purpose?
A. I don't remember that.
Q. Have you any idea when the last time was?
A. Yes, sir, the last time was when we went after the C. I. O. in the last election. I don't remember

which one of the trustees handed me the money to have printing done to go after the C. I. O.

Q. Who sent it to you?

A. One of the trustees.

Q. About how much did you spend?

A. $700.00.

Q. Where did you spend it?

A. I spent some at a little concern on Fifth Avenue, and there was a little concern in the Fisher Building.

Q. Where were those firms?

A. I can go right to them.

Q. On Fifth Avenue?

A. I mean on Wells Street.

Q. Isn't that the same concern on Wells Street you have dealt with for a good many years?

A. I think so. I don't remember the name.

Q. Have you got a receipt from the concern on Wells Street?

A. I haven't got it.

Q. You can't produce it?

A. The trustees have it.

Q. What trustees?

A. The trustees of the Puritan Church.

Q. You mean those fellows in Canada?

A. Yes, sir.

Q. So the receipt is in Canada?

A. Yes, sir. We understand the Tribune law firm, and we have our records in Canada.

[fol. 135] Q. We know your feeling. Why don't you stop the speeches?"

Said Parker further testified that he was unable to name the members of said so-called "Puritan Church" or said so-called "Mother and Father Church of the Puritan Church of La Grange, Illinois," unless he could see the records; whereupon the following transpired:

"Q. Are there any other members included in this local corporation? [Puritan Church of LaGrange, Illinois.]

A. I don't know.

Q. You cannot name any others?

A. No, sir. I will have to get the records.

Q. Now, the records of the Chicago, Illinois, church are in Canada?

A. Everything is in Canada. There is not a single record in Illinois of that church.

Q. Why were they taken to Canada?

A. Because they knew the law firm of Kirkland, Fleming, Green, Martin & Ellis, and Weymouth Kirkland told me he would fix every court in Illinois in which the Church was involved when I told him the Church decided we will take on Kirkland and McCormick. We will find out whether they can run the State of Illinois or if the Church can complain. If the Church cannot complain, we will move to Australia in a body as we moved from England when they put Charles I on the block for violating the constitution. If we cannot stop the violation of the constitution here, we will move there and have a new constitution.

Q. So they moved to Canada?

A. No, they did not want to move out of this country. They prefer to stay here to protect it.

Q. So they moved the records?

A. They moved the records.

Q. So that the State's Attorney could not get hold of them?

A. They are not afraid of the State's Attorney or the Attorney General, or anybody else, because there [fol. 136] is nothing illegal. I will [tell] you now neither the State's Attorney or the Attorney General has power to look into any affairs of the Church in this at all, neither has Congress, neither has the courts.

Q. Well, in spite of that you had the records of the Church moved to Canada?

A. Yes, sir.

Q. Because you were afraid that Kirkland would steal the records?

A. Kirkland told me he would fix the courts.

Q. Did he tell you he would steal the records of the Church?

A. He told me he would fix every court in Illinois in which I had any litigation. He told me that Ellis——

Q. He must have been going——

A. Yes I think he must have been haywire. He told me if the courts are that kind, the Puritans won't know about it.

Q. Well, the courts are right now, as I understand it, trying to find out about the Puritans.

A. It is, if there is any legal way. The Puritans have nothing to hide, but they won't permit you to do it illegally. They will stand on the law and the constitution, and if anybody has got a right to, the Puritan Church's records are open.

• • • •

I have got proof three judges have violated the constitution. If you want the proof, I will bring it to you. They should be hanged for that."

Said Parker further testified:

"The church is going to run me for a judge for the Circuit Court in order to get before the people the stories we want to tell about [Judge] and [Judge]. That is the reason I am being run.

Q. The church don't want you to be judge, they want to get the publicity?

A. They want to get the publicity against [Judge] and [Judge], and they want me to run for Circuit Court judge, and I am having the petitions printed in order to get the publicity against them.

• • • •

[fol. 137] Q. How do you happen to know all the facts?

A. Because I know all the facts of the church.

Q. Because you are the church?

A. I know all the facts of the church because I am a very interested worker in the church right now. When I am in anything, I always am very careful to know all of the details."

(13) On January 2, 1945, this defendant made a motion in writing supported by affidavit (under Rule 17, subparagraphs 8 and 9 of the Rules of the Supreme Court of Illinois) for an order directing said Parker to show cause why he should not produce for inspection, or to be copied or photographed, the documents described in said written motion; and for an order directing said Parker to state

by affidavit whether any of the documents described in said motion were then or had at any time been in his possession or power, and if not then in his possession or power, when he parted with the same and what had become thereof. The documents described in said motion included all records of said so-called "Puritan Church", and said so-called "Brotherhood of The Ancient Order of St. John," including memoranda, writings, minute books, written resolutions etc., between January 1, 1940, up to and including the present time, and particularly those records of said so-called "Puritan Church" and said so-called "Brotherhood of The Ancient Order of St. John" showing or reflecting all activities of said purported bodies and members thereof in conection with the financing, carrying out, or threatening to or pretending to carry out the activities of the so-called "Puritan Church Committee to Aid in Driving the Hoodlums, the Assassins and the Blackmailers out of the [fol. 138] Control of Labor Unions, out of the Control of the Legal Profession, out of the Control of Journalism, and out of the Control of Politics."

Said Parker resisted said motion and the following transpired in open court:

"Mr. Parker: Your Honor, there is not a single request there that is pertinent to the issue. He wants the records of the Puritan Church. I told Your Honor they are in Canada.

Mr. Martineau: We want that set up by affidavit under Rule 17. This man is very slippery.

Mr. Parker: Your Honor, there is no power in the court to ask for these things. They are records of the church. I have nothing to do with them.

Mr. Martineau: Your Honor, Mr. Parker has said many times that he can get these records here. I am prepared to show all this. I am proceeding under Section 17, sub-sections 8 and 9. If he wants to state what he has just said under oath in an affidavit, that is his privilege, but we do have a right to have him make that formal statement under oath. Rule 17, Sub-sections 8 and 9.

• • • •

Mr. Parker: But the rule of the Supreme Court is about matters relative to the issue. They are not relative to the issue.

The Court: They are relevant to the issue or may be.

Mr. Parker: Your Honor, I suppose I have no objection to your entering the order, if you want to do it.

The Court: Now, fine, we are agreed upon one thing, at least.

Mr. Martineau: How many days do you want, Mr. Parker, to answer?

Mr. Parker: What day is it you say we are coming back here for trial? What day is it?

Mr. Martineau: I think His Honor said——

The Court: I said Monday before this matter was discussed.

[fol. 139] Mr. Martineau: How many days would you want?

Mr. Parker: Well——

The Court: If they are to be in here Monday——

Mr. Parker: They are not coming back, Your Honor. There is no worry about that. I can answer that thing. I should say, give me until Friday, and I will have a nice answer, one that the town will be glad to have on record."

Thereupon an order was entered on January 2, 1945, requiring said Parker, within five days from the date thereof, to show cause and to file the affidavit requested by said motion.

(14) On January 4, 1945, said Parker filed in the office of the Clerk of the Circuit Court of Cook County an affidavit in which he swore inter alia that in November, 1944, he had destroyed all originals, duplicate originals and copies of all letters, telegrams, writings, memoranda, etc., passing between Conrad Miner, Charles Norris and himself, said Parker; and that he had also destroyed in November, 1944, all minute books, written resolutions, by-laws, trust deeds, contracts, books of account, invoices, receipted bills, cancelled checks, check stubs, bank statements and correspondence of and concerning said so-called "Puritan Church" and said so-called "Brotherhood of The Ancient Order of St. John," except for four pretended documents (three of them scurrilous, defamatory and contemptuous) which said Parker attached as exhibits to said affidavit and filed in direct contempt of this honorable court.

(15) Said Parker has stated under oath that said so-called "Puritan Church" and said "Brotherhood of The Ancient Order of St. John" have made plans to hang and [fol. 140] murder numerous citizens and public officials, including the Governor of Illinois, several judges of the Supreme Court of Illinois, the Appellate Court of Illinois, and the Circuit and Superior Courts. Said Parker, in his deposition heretofore taken, identified letters he had written threatening to commit the above-mentioned murders, which letters he had signed "Puritan Church—by Harrison Parker." It was therefore alleged by and on behalf of this defendant in the divers petitions (filed to procure subpoenas) that said so-called "Puritan Church" was either in conspiracy with said Parker to commit extortion by threatening to commit the above-mentioned murders, or else was merely a sham devised by said Parker in an attempt to surround his attempted extortion and blackmail with an odor of sanctity.

Said Parker, in resisting said petitions, and all other attempts to ascertain by deposition and in open court the identity and whereabouts of the persons he pretended composed said so-called "Puritan Church" and said so-called "Brotherhood of The Ancient Order of St. John," stated under oath, both in the taking of his own and other depositions, and also in open court, on numerous occasions, that said so-called "Puritan Church", and said so-called "Brotherhood of The Ancient Order of St. John" had three "trustees," one Conrad Miner, one Charles Norris, and one Homer Race, but that he did not know the whereabouts or residence of any of these three supposed "trustees."

Defendant was and is still seeking to procure the testimony of said three supposed "trustees," Miner, Norris and [fol. 141] Race, for the purpose of showing either that said so-called "Puritan Church" and said so-called "Brotherhood of The Ancient Order of St. John" were either in conspiracy with said Parker to commit the crime of extortion by threatening to commit the above described murders, or else were merely shams and fraudulent devices designed by said Parker in an attempt to surround his attempted extortion and blackmailing with an odor of sanctity.

In the affidavit of said Parker, filed on January 4, 1945, he now swears that in November, 1944, (while the inquiry

into the whereabouts of said three supposed "trustees," Miner, Norris and Race, was pending in court) he, said Parker, destroyed all correspondence between himself and said Miner, Norris and Race. It further appears that if said correspondence had been produced by said Parker, and not destroyed by him, it would have been possible for this defendant to have discovered therefrom the present whereabouts of said Miner, Norris and Race, and to have procured their testimony in order to prove the activities of said Parker and the so-called "Puritan Church" and the so-called "Brotherhood of The Ancient Order of St. John" in the commission of attempted extortion and blackmail by means of threats to hang and murder the citizens and public officials mentioned above, or else that said pretended "religious" bodies were merely shams devised by said Parker for the purpose of attempted blackmail and extortion with an odor of sanctity. Wherefore it appears that by destroying said correspondence said Parker knowingly destroyed material evidence in this cause.

[fol. 142] (16) As stated above in Paragraph 13 hereof, among the documents which said Parker was directed by said order of January 2, 1945, to show cause why he should not produce to be copied and photographed were the following: The records and correspondence of and concerning said pretended "Puritan Church Committee to Aid in Driving the Hoodlums, the Assassins and the Blackmailers out of the Control of Labor Unions, out of the Control of the Legal Profession, out of the Control of Journalism, and out of the Control of Politics—Conrad Miner, Charles Norris, Harrison Parker, Chairman;" and said order of January 2, 1945, also directed said Parker to state by affidavit whether any of said above described documents were ever in his possession or control and if so when he parted with the same and what has become thereof.

In his said affidavit of January 4, 1945, said Parker swears, "This affiant never heard of, nor has he ever had any connection with such an organization."

In contradiction to said affidavit said Parker, during the taking of his deposition in this cause before E. E. Wenger, notary public, on January 19, 1944, produced voluntarily and insisted upon reading into the record a purported copy of a scurrilous communication dated December 18, 1943, sent by him to Honorable Dwight P. Green, Governor of

Illinois. Said document was marked "Defendant's Exhibit 53" in said deposition. Said scurrilous communication is on the letterhead of said "Puritan Church" and contains on its left-hand upper corner the legend "Puritan Church. [fol. 143] Committee to Aid in Driving the Hoodlums, the Assassins and the Blackmailers out of the Control of Labor Unions, out of the Control of the Legal Profession, out of the Control of Journalism, and out of the Control of Politics —Conrad Miner, Charles Norris, Harrison Parker, Chairman," and it is signed "Puritan Church—by Harrison Parker, Chairman of its Committee;" and said Parker swore, during the taking of his said deposition:

> "I personally sent Defendant's Exhibit 53 as Chairman of the Committee. The Committee is defined in the letterhead on the first page, 'Puritan Church Committee to Aid in Driving the Hoodlums, the Assassins and the Blackmailers out of the Control of Labor Unions, out of the Control of the Legal Profession, out of the Control of Journalism, and out of the Control of Politics—Conrad Miner, Charles Norris, Harrison Parker, Chairman.' That is the Committee I refer to. Now, this was sent to the Governor by registered letter and the Church has its receipt. Now, the Church is making this letter possible in the nation-wide fight it is going to make against Robert R. McCormick and Kirkland and those named before, which will start about February 1st. This will be a nation-wide campaign against those who violate the Constitution."

and said Parker then sent on to testify that Governor Green and all the public officials and citizens mentioned in said scurrilous letter, Defendant's Exhibit 53, were going to be hanged by said so-called "Puritan Church" and said so-called "Brotherhood of The Ancient Order of St. John;" and that the President of the United States, Members of Congress, Judges of the Supreme Court of the United States, or any other federal officials or judges found guilty [fol. 144] of being "a Constitution violator," "will be killed like you kill rats." Yet said Parker has sworn in said affidavit filed in this court that "this affiant has never heard of, nor has he ever had any connection with such an organization."

WHEREFORE, PETITIONER PRAYS:

(1) An order be entered directing said Parker to show cause why he should not be punished for contempt of court first, for obstructing justice by destroying the above mentioned records of said so-called "Puritan Church" and said so-called "Brotherhood of the Ancient Order of St. John" and said correspondence between said Parker and said Miner, Norris and Race while the same were being sought as evidence material to the merits of the matter in question in this cause; second, for obstructing justice by committing perjury by knowingly falsely swearing in open court on December 4, 1944, and on January 2, 1945, that all of said records were then in Canada; and third, for obstructing justice by committing perjury by knowingly falsely swearing in his said affidavit of January 4, 1945, that he had never heard of and never had any connection with the so-called "Puritan Church Committee to Aid in Driving the Hoodlums, the Assassins and the Blackmailers out of the Control of Labor Unions, out of the Control of the Legal Profession, out of the Control of Journalism, and out of the Control of Politics—Conrad Miner, Charles Norris, Harrison Parker, Chairman."

(2) PETITIONER LIKEWISE PRAYS that said Harrison Parker be ordered to answer this petition under oath [fol. 145] within a short day to be fixed by the Court.

JACOB SHAMBERG, Defendant,
By KIRKLAND, FLEMING, GREEN,
MARTIN & ELLIS,
His Attorneys.

STATE OF ILLINOIS, } ss.
COUNTY OF COOK. }

J. B. Martineau, Jr., being first duly sworn, on oath deposes and says that he is a partner in the firm of Kirkland, Fleming, Green, Martin & Ellis, attorneys for the defendant in the above entitled case; that he is duly authorized to make this affidavit in this behalf; that he has read the above and foregoing petition and that the same is true in substance and in fact to the best of affiant's knowledge, information and belief.

J. B. MARTINEAU.

Subscribed and sworn to before me, a notary public, this 15th day of January, A. D. 1945.

Robert Plante.

MOTION TO DISMISS—FILED JAN. 15, 1945.

Now comes the defendant Jacob Shamberg, by Kirkland, Fleming, Green, Martin & Ellis, his attorneys, and moves the Court to dismiss the action herein at plaintiff's costs upon the following grounds:

1. This defendant represents that upon the 3rd day of January, 1944, an order was entered on motion of this defendant requiring said Parker to appear before E. E. Wenger, Notary Public, and give his deposition for discovery; the taking of the deposition of said Parker commenced on [fol. 146] January 17, 1944, and continued from day to day thereafter; during the taking of said deposition said Parker refused to answer certain questions which are set forth in the petition of E. E. Wenger heretofore filed herein on the 3rd day of February, 1944.

2. This defendant further represents that during the hearing in open court on February 28, 1944, upon said petition the following occurred:

"Mr. Martineau: We claim we have a right to go into that to show Mr. Parker is in conspiracy with the church. He has said the Puritan Church is going to hang McCormick and Kirkland, the implication being unless there is a payoff——

"Mr. Parker: No, there is nothing of that kind. Bring it in here, and if there is, I will dismiss this lawsuit.

"Mr. Martineau: Unless there is a payoff, the Puritain Church is going to hang——

"Mr. Parker: If you bring in such a letter I will dismiss this lawsuit. I will give my promise to the court right here.

"Mr. Martineau: Keep quiet a minute. He testified that if Mr. McCormick would pay the damage he suffered in 1932 when the Tribune printed the so-called libel against him, which incidentally the jury found was true, Mr. Parker testified in this deposition that if McCormick and the Tribune Company would pay those damages he claims he suffered, he would go to California and shut up and keep still and not write any more letters or send out any more pamphlets suggesting or threatening the hanging of Colonel McCormick or the Kirkland law firm.

"Mr. Parker: If you will produce that I will dismiss the lawsuit.

"Mr. Martineau: I will produce it.

"Mr. Parker: Produce it. Remember you have that offer."

* * * * * * *

[fol. 147]. "The Court: Go ahead with your proof.

"Mr. Martineau: Shall I go ahead?

"The Court: Yes.

"Mr. Martineau: This question was asked him:

'Q. Let us agree on the definition of blackmail. How do you define blackmail?

'A. As I understand blackmail is where you use some wrong means to collect some money.

'Or to get somebody to do something they do not otherwise have to do?

'Yes, that is my understanding of it. When Howard Ellis said to me, "You dismiss this libel suit against the Tribune or the Tribune will get rough with you," that is what I call blackmail. You will never find me dealing in any blackmail. I had a libel damage and I went after it in every way. My opinion is McCormick has violated the laws and corrupted the courts of this state, and that he should be shot.

'If he paid up you would stop saying that, and you would be friendly?

'No, I have always said that.

'Let us be fair. Let us be intellectually fair with each other. If McCormick would pay you what you claim you suffered in the libel suit, you would stop saying he ought to be shot, wouldn't you?

'I think I would.'

"Mr. Parker: Yes, I said I think I would. In other words, if I have a disagreement with you and you come over to me and shake my hand, and I take your hand, and I abuse you again, I am a dirty crook. I say that if McCormick would in any way—I have said in the record if he would send a carnation that he has wronged me and my family, this fight is over. Why should I fight him?

"Mr. Martineau: Shall I go on, your Honor?

"Mr. Parker: Go ahead.

"Mr. Martineau: 'I think I would.

'Or hanged?

'I think I would.

'And you would feel friendly towards him?

[fol. 148] 'In other words, I would not hurt McCormick under any circumstances. If he hadn't hurt me I would never hurt him.'

"Mr. Parker: That is right.

"Mr. Martineau: 'Now, if McCormick decided to right the wrong he has done to me and my family, I don't see why I should ever pursue him any more. I don't see why I should continue with the tax matter.

'Not in any way?

'Not in any way. Why should I pursue against him?

'You would go back to California and join your wife?

'The tax matter is out of my hands.

'In other words, if that was done, you would go back to California and join Mrs. Parker and sit on your porch and read books all the rest of the time that God would allot to you?'

"I was not being poetical, your Honor. That was a quotation from one of Mr. Parker's letters.

'If McCormick would ever right the wrong he has done, I would have no fight with him. There would be no difficulty between me and him.

'In other words, the war is over and you would quit warring?

'Yes. Why should I keep on fighting with a man in politics and in the newspaper business? I am a private citizen. Why should I keep fighting him if he pays for the wrong he has done me?

'Now, you claim you still have a claim for the damages you claim was done to you in the libel suit?

'There is not enough money to pay for the damage that was caused by the libel. Now, as I see it, in justice to my family, I had to go through—I had to take either of two routes, either sue him or kill him, either one. I chose to sue him because that is the peaceful way. He promptly had his lawyers fix the

jury and the judge and said they would not give me a cent.

[fol. 149] 'Let us save that for the final argument. Give me your theory.

'Now, I say that damage has been done. If Colonel McCormick should ever decide to right the wrong which he has done me——

'How could he do that according to your theory?

'I don't know.

'Well, if he paid for the damage you claim you have suffered, would that be "righting the wrong"?

'I am not going to answer that.

'Do you mean you refuse?

'No; I don't refuse. The damage has been done now. I was put in jail. My name was ruined forever.

'It had been ruined a long time before that?

'No, it had not. I had never been in jail. A lot of people had libeled me, but I had never been in jail until Colonel McCormick put me there.'

"And so forth. It goes on into something else. But I say I accepted Mr. Parker's offer.

"Mr. Parker: No, you did not. Read what I said.

"Mr. Martineau: Have him dismiss this lawsuit.

"Mr. Parker: Have him read what I said.

"The Court: All right, read the record.

"Mr. Martineau: Read the record back there what Mr. Parker said and what I said.

"The Court: Let us read the record.

"(Record read by reporter.)

"The Court: What about this last statement?

"Mr. Parker: I have definitely said that money would not pay the damage.

"Mr. Martineau: Let me read it again:

"Q. If McCormick would pay you what you claim you suffered in the libel suit, you would stop saying he ought to be shot, wouldn't you?

'A. I think I would.

'Q. Or hanged?

'A. I think I would.'

[fol. 150] "Mr. Parker: I didn't say I would. I am a Christian, and I think I would right now. I didn't

say I would. There is no mention there about money either."

This defendant represents that said admissions by said Parker go to the heart of this action inasmuch as they amount to an admission by said Parker that he was guilty of blackmail and that if he had so admitted—as he did—his action would be so lacking in merit as to warrant dismissal thereof by the court.

3. This defendant further represents that upon the 22nd day of March this defendant filed his petition for leave to take the deposition of certain persons; said petition contained among others the following averments:

1—Parker has admitted in his deposition that one Catherine Whalen has been employed by said Church to write certain pamphlets and other writings which are distributed by said Church.

2—Parker has admitted in his deposition that the contributions received by the Church were to be used to carry on its campaign to shoot or hang all alleged constitutional violators.

3—In a deposition said Parker has identified over 1100 letters and pamphlets written, mailed and published to various persons, firms, and corporations containing threats to expose the alleged shortcomings and threats to kill and harm a large number of persons, firms, and corporations, including numerous judges and public officials whom Parker has listed as constitutional violators.

4—In a deposition "heretofore taken it was discovered that one J. L. Stewart, one M. S. Johnson and one C. C. Waterbury had been represented as trustees of said Puritan Church."

At a hearing in open court upon said last mentioned petition the following occurred:

[fol. 151] "Mr. Bates: * * * You are making a nice offer.

"Mr. Parker: Yes, I make it in good faith; any one of them, I make in good faith. Your petition is no good because of these misstatements.

"The Court: Do you mean to tell me if he proves any of these statements you will dismiss the law suit?

"Mr. Parker: Yes."

5. This defendant further represents that during the taking of his said deposition said Parker testified as follows:

"A. That is literature that is sent our gratuitously, sent by the church.

Q. That is some of the lessons?

A. Yes, sir, gratuitously, sent by the church.

Q. You had something to do with preparing that material?

A. For the most part it was prepared by my grandsire, Major Parker, and from the records of the church. It is an old church, and I have turned over all those records to the church.

Q. Doesn't a lady named Miss Whalen have something to do with this?

A. No.

Q. Didn't she write some of it?

A. No.

Q. You have had some dealings with her?

A. No, the church asked me to find out somebody in Chicago who could edit.

Q. Write the memoirs of Major Parker?

A. No, not the memoirs, I mean articles of everything the church had.

Q. The church archives?

A. Yes.

Q. They were in Major Parker's possession, and they descended to you?

A. Yes.

Q. Or to your father and then down?

A. Yes. So I did not know of anybody who I thought could edit that, so I went to a man named Lennington.

Q. Lennington.

A. Yes.

Q. In Chicago?

A. Yes.

[fol. 152] Q. Where does he live?

A. I don't know. I know him as an efficient person, and I asked him if he knew of any person who could edit that material. He said that he did not, but he said, 'Mr. Parker, here is an advertisement in the Sunday Tribune. There are several advertisements in there of people who do that work for money.'

So he gave me—he turned right to the Sunday Tribune, and I cut out the list and the first one happened to be Miss Whalen.

Q. Is her name Catherine Whalen?

A. Catherine Whalen. So I went over to see Miss Whalen and I asked her if she had a person in her employ who could edit this material which would be sent to her. She looked it over and she said she had a man who could do it beautifully, an Oxford graduate, an Englishman who could do it very well. So she brought the Englishman in touch with me, and I saw he was a man seventy odd years old, of mature judgment and so forth, and I told Miss whalen I thought he could edit this, and she took the contract and edited it. I think they cost, if I recall, $125 apiece to edit them. That was all there was to it.

Q. Who paid it?

A. The church.

Q. Through you?

A. No.

Q. Were you present when she was paid?

A. No.

* * * * * * *

"She hired another man to edit the articles."

6. This defendant further represents that during the taking of his said deposition said Parker testified as follows:

Q. I notice here that the church says it is going to use the funds which it is going to get by contribution to compel the Tribune by court proceedings to disgorge the money it has stolen from Cook County, to compel the Illinois Legislature to impeach Circuit Court Judges Harry M. Fischer and Joseph Burke, and Justices Wilson, Stone and Gunn of the Supreme Court of Illinois for the crooked opinions they have [fol. 153] written in Tribune litigation and it is going to compel a new constitution for Illinois and is going to compel the retirement of Robert R. McCormick, Ed Kelley and the Kelly-Nash machine. Is it going to do that?

A. Yes, sir, it is working on it now.

Q. But it has not done it yet?

A. No, it is working on it now.

* * * * * * *

A. Governor Green never answered the letter and the Puritan Church are delighted that he never answered.

Q. I suppose he will be on the list that should be shot or hanged?

A. They hope Governor Green comes out for president.

Q. They are not going to hang him?

A. He has not violated—yes he has violated the constitution. The list was made up in August and I suppose the next time they meet they will take him on.

Q. They will put him on the list of people to be shot or hanged?

A. Yes. All constitution violators are to be pursued by the Puritan Church and the Order of St. John until the finish. This is a finish fight.

Q. Preferably at the end of a rope?

A. Yes, sir, they are advocating the end of the rope for any man who violates the constitution in order to increase his private fortune."

7. With regard to Item 3 described in paragraph 3 hereinabove, this defendant represents that during the taking of said deposition said Parker identified over 1100 letters and documents signed by him either in his own behalf or as a supposed dignitary of the so-called "Puritan Church," most of which documents will upon inspection thereof prove the representations made in said petition hereinabove described in paragraph 3 hereof.

[fol. 154] 8. With regard to Item 4 of said petition described in paragraph 3 hereof, this defendant represents that he caused to be taken the deposition of one T. F. Thorne, an officer of the Mercantile National Bank, at which a bank account of said so-called "Puritan Church" was maintained. During the taking of said deposition of said T. F. Thorne, there was produced by said T. F. Thorne by subpoena duces tecum a certain document made a part hereof and marked Exhibit A, which document shows that said Jessie L. Stewart, M. S. Johnson and C. C. Waterbury were represented by one A. Richardson, claimed by

said Parker to be the "chancellor" of said so-called "Puritan Church," to be trustees of said so-called "Puritan Church."

This defendant represents to the Court that the offers of said Parker to dismiss this action if any one of said averments were true is tantamount to an admission by him that if any one of said averments were true then by the same token this action is so entirely lacking in merit that it should be dismissed.

Wherefore, this defendant prays that said action be dismissed at plaintiff's costs.

JACOB SHAMBERG,
By KIRKLAND, FLEMING, GREEN,
MARTIN & ELLIS,
His Attorneys.

[fol. 155] STATE OF ILLINOIS, } ss.
COUNTY OF COOK. }

Bennitt E. Bates, being first duly sworn, on oath deposes and says that he is associated with the firm of Kirkland, Fleming, Green, Martin & Ellis, attorneys for the defendant in the above entitled cause; that he is duly authorized to make this affidavit in this behalf; that he was present at the hearings hereinabove mentioned and that the statements contained in the above motion are true and correct of affiant's own knowledge.

Further affiant saith not.

Bennitt E. Bates.

Subscribed and sworn to before me this 25th day of August, A. D. 1944.

Eleanor Hathaway,
(Seal) *Notary Public.*

[fol. 156] EXHIBIT A TO ABOVE MENTIONED PETITION.

RESOLUTION OF BOARD OF DIRECTORS

I, A. Richardson, do hereby certify that I am the duly elected and qualified Chancellor of the congregation of the Puritan Church, a corporation organized and existing under the laws of Illinois, and the keeper of its records and corporate seal, and that the following is a true and correct copy of certain resolutions adopted at a meeting of the Board of Directors thereof, a quorum being present, convened and held in accordance with law and the by-laws of said corporation on the 15th day of July, 1943, and that the said resolutions have not been rescinded or modified:

Be it Resolved, that the Mercantile National Bank of Chicago, be and hereby is designated a depositary in which the funds of this Corporation may be deposited by its officers, agents, and employees, and that any two of the following officers or employees of this corporation M. S. Johnson, Trustee; J. L. Stewart, Trustee; C. C. Waterbury, Trustee; L. H. Holland are authorized to draw and sign any and all checks, drafts, and orders against said account and to endorse for deposit or negotiation all negotiable instruments and orders for the payment of money, which endorsements may be made in writing or by a stamp and without designation of the person so making it.

And Be it Further Resolved, that said Mercantile National Bank of Chicago, be and is hereby authorized and directed to honor and pay any and all checks, drafts, and orders so signed and drawn, whether such checks be payable to the order of any officer or person signing them, or any of said officers or persons in their individual capacities or not, and whether they are deposited to the individual credit of the officer or person signing them or to the individual credit of any of the other officers or persons or not.

And Be it Further Resolved, that any two of the officers or employees of this Corporation, M. S. Johnson, Trus-
[fol. 157] tee; J. L. Stewart, Trustee; C. C. Waterbury, Trustee, L. H. Holland are authorized to borrow from time to time on behalf of this Corporation from the said Bank

such sums of money for such times and upon such terms as may to them, or any of them, seem advisable, and to execute in the name of the Corporation, notes, drafts, or agreements for the repayment of any sums so borrowed, and they and each of them are hereby authorized to discount with the said Bank, any of the notes, bills receivable or acceptances held by this Corporation upon such terms as they may deem advisable, and to pledge or hypothecate as security to said Bank, any of the notes, bonds, stocks, bills receivable, warehouse receipts and/or other documents, accounts, securities and/or property of the Corporation, and to execute and deliver any and all endorsements and instruments of assignment or transfer which may be necessary or proper in such cases, effectually to transfer to the said Bank the property so hypothecated or delivered.

Be it Further Resolved, that each of the foregoing resolutions shall continue in force until express written notice of its rescission or modification has been received by the said Bank, but if the authority contained in them should be revoked or terminated by operation of law without such notice, it is resolved and hereby agreed for the purpose of inducing the said Bank to act thereunder, that the said Bank shall be saved harmless from any loss suffered, or liability incurred by it in so acting after such revocation or termination without such notice.

I Further Certify that the following named persons are the officers of said Corporation, duly qualified and acting as such:

Trustee M. S. Johnson
Trustee J. L. Stewart
Trustee C. C. Waterbury

In Witness Whereof, I have hereunto subscribed my name and affixed the seal of said Corporation, this 2nd. day of August, 1943.

(Signed) A. Richardson

[fol. 158] On January 22, 1945, Parker filed an answer to the rule to show cause. Said answer is set forth as Exhibit A to the order of January 23 [infra, p. 162].

On January 23rd the following order was entered [Second Contempt Matter]:

STATE OF ILLINOIS, } ss.
COUNTY OF COOK. }

IN THE CIRCUIT COURT OF COOK COUNTY.

Harrison Parker, *Plaintiff.*	
vs.	No. 43 C 13381
Jacob Shamberg, *Defendant.*	
People of the State of Illinois,	
vs.	
Harrison Parker.	

ORDER.

THIS CAUSE COMING ON TO BE HEARD upon the sworn petition of the defendant, Jacob Shamberg, filed by leave of court on January 15, 1945, while the cause of "Harrison Parker, Plaintiff, *vs.* Jacob Shamberg, Defendant, No. 43C13381" was still pending before this court, for an order requiring said Parker to show cause why he should not be punished for crimnal contempt of court by reason of the matters and things in said petition alleged, and upon Harrison Parker's answer thereto filed on January 22, 1945;

THE COURT FINDS:

(1) The Court has jurisdiction of the parties and of the subject matter hereof;

[fol. 159] (2) That on January 15, 1945, a sworn petition was filed on behalf of the defendant, Jacob Shamberg, in the case of "Harrison Parker, Plaintiff, *vs.* Jacob Shamberg, Defendant, No. 43C13381", which sworn petition charged said Harrison Parker with criminal contempt of court by reason of the matters and things therein alleged;

(3) That on January 15, 1945, an order was entered by this Court, requiring the said Harrison Parker to show cause by Friday, January 19, 1945 why he should not be punished for criminal contempt of court by reason of the matters and things set forth in said petition filed on behalf of said Jacob Shamberg;

(4) That on Thursday, January 18, 1945, an order was entered on the motion of said Parker extending the time within which he was to file his answer to said rule to show

cause up to and including ten o'clock A. M., Monday, January 22, 1945;

(5) That on Monday, January 22, 1945, said Parker filed in the office of the Clerk of the Circuit Court of Cook County his "Answer to Petition for Rule to Show Cause", a true and photostatic copy of which Answer is attached hereto, incorporated herein, made a part hereof, and marked "Exhibit A" hereto;

(6) That said "Answer to Petition for Rule to Show Cause", so filed by said Harrison Parker on January 22, 1945, which answer is attached hereto, incorporated herein, made a part hereof, and marked "Exhibit A" hereto, does not purge said Parker of the criminal contempt charged in said sworn petition filed on behalf of said Shamberg on January 15, 1945;

[fol. 160] (7) That in said "Answer to Petition for Rule to Show Cause", so filed by said Parker on January 22, 1945, said Parker has affirmatively set forth scurrilous, scandalous, defamatory, immaterial matter, which constitutes an obstruction of justice and an abuse of the processes of this court, and which conduct of said Harrison Parker took place while this court was in open session and tended to lessen the dignity and authority of this court;

(8) THE COURT FURTHER FINDS that said Harrison Parker, who is now here present in open court, is, by reason of said conduct, guilty of direct criminal contempt of this court;

WHEREFORE, THE PREMISES CONSIDERED:

IT IS ORDERED AND ADJUDGED that said "Answer to Petition for Rule to Show Cause", heretofore filed by said Parker in the office of the Clerk of this court on January 22, 1945, which is attached hereto, incorporated herein, made a part hereof, and marked "Exhibit A" hereto, be, and the same is hereby, attached hereto, incorporated herein, made a part hereof, and marked "Exhibit A" hereto, with the same force and effect as if the same were set forth in full in the body of this order; and

IT IS FURTHER ORDERED AND ADJUDGED that said Rule to Show Cause, heretofore issued by this court on January 15, 1945, requiring Harrison Parker to show cause why he should not be punished for contempt of court by

reason of having committed the acts set forth in said petition heretofore filed on behalf of said Jacob Shamberg on January 14, 1945, in the case entitled "Harrison Parker, Plaintiff, *vs.* Jacob Shamberg, Defendant, No. [fol. 161] 43CI3381", be, and the same is hereby, made absolute; and

IT IS FURTHER ORDERED AND ADJUDGED that said Harrison Parker was and is hereby adjudicated guilty of and in direct criminal contempt of this court by reason of his having affirmatively set forth scurrilous, scandalous, defamatory and immaterial matters set forth by him in said "Answer to Petition for Rule to Show Cause", heretofore filed by said Harrison Parker in the office of the Clerk of this Court on January 22, 1945; and

IT IS FURTHER ORDERED AND ADJUDGED that said Harrison Parker stand committed to and be confined in the County Jail in said County of Cook and State of Illinois for ninety (90) days; and

THE COURT FURTHER ORDERS AND ADJUDGES that a warrant of commitment do now issue in due form for the arrest forthwith of said Harrison Parker, directed to the Sheriff of Cook County, in the State of Illinois, and that when arrested by said Sheriff said Harrison Parker be committed to said jail and that he be there held for ninety days (90) or until he shall be otherwise discharged from said imprisonment by due process of law.

ENTER:

DANIEL P. TRUDE,
Judge.

Done this 23d day of January, 1945.

[fol. 162] Exhibit A to Last Mentioned Order

State of Illinois, } ss.
County of Cook, }

In the Circuit Court of Cook County

Harrison Parker }
vs. } No. 43 C 13381
Jacob Shamberg }

Answer to Petition for Rule to Show Cause.

The respondent, Harrison Parker, pro se, herein referred to as respondent, answering the petition of the defendant, Jacob Shamberg, herein referred to as petitioner, for rule to show cause, says:

1. That said E. E. Wenger, a notary public, did issue his subpoenas to said Elmer Benton and said Dr. Richardson commanding them to appear in the office of Kirkland, Fleming, Green, Martin & Ellis, attorneys representing the defendant herein, now the petitioner, to appear on said date, and to bring with them certain papers and documents therein described; that this respondent appeared before said Wenger and then and there gave certain reasons for their not appearing at said time and place;

2. That on February 23, 1944, this respondent did file a petition before this Court, setting forth that said subpoena for the purpose and reasons on which it was issued was illegal and in contravention of the rights of this respondent, said Benton and said Dr. Richardson and of said Puritan Church.

3. That on February 28, 1944, said Benton and said Dr. Richardson appeared before said notary but refused to answer certain questions put to them, as being illegal and improper and in contravention of certain rights guar- [fol. 163] anteed to them and all of them as well as to the Puritan Church by the Constitution of the United States; that thereafter, despite their statements made to and before said Wenger, said petitioner and his counsel continued to proceed in their illegal, improper and unconstitutional line of questioning, which culminated when the question was asked if she had any papers of the Puritan Church and she answered, "Never." See petition, paragraph 3, page 4.

4. That this respondent did, on March 1, 1944, file a second sworn petition setting forth his objections to the illegal, improper and unconstitutional "fishing expedition" on which the defendant, now the petitioner herein, was embarked, and requesting the Court that the defendant and his attorneys be restrained from proceeding to take any depositions from said Benton or said Dr. Richardson, having to do with, or pertaining to, the said Puritan Church, or the Brotherhood of the Ancient Order of St. John, among other matters in said petition stated; therein this respondent further pointed out that none of said parties were or had ever been, nor could they ever properly be, parties to this litigation, or could they ever be called upon to testify as the petitioner and his attorneys were attempting to force them to do.

5. On March 2, 1944, in a hearing before the Honorable Cornelius J. Harrington, Judge of this Circuit Court of Cook County, this respondent said, "I think they are both in St. Louis at the present time", meaning that he thought but did not state the fact to be that the records of said [fol. 164] Puritan Church, and/or of the Brotherhood of the Ancient Order of St. John were in St. Louis.

6. Again on March 22, 1944, the petitioner and his counsel filed another petition before the Court setting forth the refusal of said Dr. Richardson and said Benton to answer the questions asked of them in the taking of certain depositions; that in said subpoenas which had been issued to them, said Dr. Richardson was required to bring in her books and records of the said Puritan Church and the Brotherhood of the Ancient Order of St. John, despite the fact that on February 22, 1944, she had testified under oath that she never in her life had in her possession any of the papers of the said Puritan Church; that it is apparent that it was illegal, wrong and improper of this petitioner to attempt to obtain any order upon said Dr. Richardson to force her to answer again, or to be asked again, any questions with regard to her possession of any books and records of the Puritan Church when she had answered approximately a month before under oath that she had never in her life had any.

7. On March 22, 1944, said petitioner and his counsel again improperly, illegally and despite the provisions of the Constitution of the United States contrary thereto,

filed another petition setting forth under oath that the records of said Puritan Church were material in this cause, and that he and/or they were informed and therefore believed that (a) this respondent had formed the Puritan Church as a means to carry on an extortion, yet, in fact, no extortion has ever existed and therefore could never be proved, nor has it been proved, but existed only in the [fol. 165] mind of the person making the affidavit on said petition; and (b) said petition misrepresented what this respondent had said and falsified the words and meaning of this respondent; and (c) reciting that this respondent had testified that any church has certain constitutional and lawful guarantees which will permit it to perform certain functions; and (d) that this respondent testified that said Puritan Church was a legal entity; and (e) that respondent had produced letters from people who have contributed to said church but said respondent never did testify, as said petition recited, that anyone ever "purchased so-called religion from" said church, and (f) said petition recited that said church had received numerous contributions from various persons, yet, in fact, said petitioner had overlooked the fact that innumerable churches, since the beginning of time, have been supported by contributions of believers, and (g) stating further that this respondent has identified over 1100 letters and pamphlets which contain threats to expose the alleged shortcomings and threats to kill and harm a large number of persons, firms and corporations, including numerous judges and public officials, yet, this respondent denies that he has ever made a threat to kill anyone, but that he has properly, for a long period of time, exposed the shortcomings of a large number of persons, firms and corporations, including numerous judges and public officials who, upon their records, should receive publicity for all of their misdemeanors and evil doings for the reason that they, as well as any and all other persons, should pay the penalty of their misdeeds, in order that orderly government shall exist in the United [fol. 166] States of America; and (h) that in a deposition this respondent stated that the Puritan Church is going to try to hang two judges of the Circuit Court and one judge of the Appellate Court because of their misdeeds, yet said petitioner forgets that such is frequently the penalty that such conduct as theirs has often received; that said petition concluded that this was sufficient ground for him to

state, under oath, that said "Puritan Church is either in conspiracy with" this respondent, or "is merely a sham designed by" this respondent "in an attempt to surround his attempted extortions with an odor of sanctity; that the books and records of the 'church' will tend to prove the allegation in the answer that said Parker is a blackmailer"; yet, there have not been a scintilla of evidence introduced, upon which such assertions could be predicated, nor which could be relied upon to prove even the possibility, on the record, that this respondent or said church had engaged in either a conspiracy, or that said church was engaged with this respondent in any enterprise that could *be* properly, honestly or decently, determine this respondent to be a blackmailer in any sense; for by the mere assertion under oath that this respondent or that said church were engaged in any conspiracy or any extortion or any blackmailing, said petition merely begged the question, and gave no more substance to an assertion of such calibre than it had had before, to-wit: an existence only in the mind of said petitioner and or his counsel who had the reckless temerity to foist a document containing all of such upon this Court; that by said brash foolishness, said petitioner and or his counsel have committed an effront-[fol. 167] ery to each, any and every church that has ever sought the protection of the laws of the State of Illinois or of the Constitution of the United States; that based upon said allegation, said petitioner and his counsel demanded that this Honorable Court order said Dr. Richardson to give her deposition and bring with her all books and records in her possession and control of said Puritan Church, despite the fact that prior thereto, to-wit: February 28, 1944, said Dr. Richardson, under oath, had asserted that never in her life had she had in her possession or control any of the books and records there sought again by that means.

8. That on October 2, 1944, said Dr. Richardson and said Benton appeared then and there and testified as is therein set forth, if each and all of the quoted portions throughout and therein be true and correct; that she then and there again, under oath, said that she had no records of the Puritan Church; that she had none in her possession and that all she had of said Puritan Church was some literature; that under no stretch of the imagination could the words "books and records" be confused with the word

"literature", and so for the second time, said Dr. Richardson answered said questions of the possession of the books and records of the said Puritan Church and she had done so prior thereto, on to-wit: February 28, 1944; and again when she, for the third time, was required to answer this question, she refused, having twice before answered the identical question, for books and records cannot conceivably cover "letters" and "correspondence", all of which said acts and doings of said petitioner and his counsel took [fol. 168] place illegally, improperly and in contravention of the provisions of the Constitution of the United States.

9. That thereafter, on October 18, 1944, again illegally, improperly and against the provisions of the Constitution of the United States, said petitioner and his counsel prayed that a rule to show cause issue against said Dr. Richardson and said Benton "for their refusal to answer the interrogatories" hereinabove referred to, and an order was entered requiring them to file their answer thereto and setting the matter for hearing, all despite the fact that the question had been asked twice and answered twice prior thereto.

10. On November 10, 1944, said Richardson and said Benton upon the order of the Court as aforesaid, filed their answer setting forth in an ample and legal sufficiency, not only their answers, but the grounds for their refusal to answer certain questions and giving the legal and constitutional grounds therefor.

11. That on December 4, 1944, this matter did come up for hearing on the rule and answer before the Honorable Daniel P. Trude, who, at about this time, was hearing said matter in place of said Judge Cornelius J. Harrington, who had heretofore ruled against the petitioner and/or his counsel, on a similar petition seeking to inquire into the books and records and activities of said Puritan Church; that said Dr. Richardson then and there testified that she was the keeper of some records, but that of some records she knew nothing whatsoever, and this, in addition to the fact that, although she had certified in a certain [fol. 169] document that she was, as of August 2, 1943, the "duly elected and qualified Chancellor of the Congregation of the Puritan Church, a corporation organized and existing under the laws of Illinois, and the Keeper of its Records and Corporate Seals", she did not on December 4,

1944, testify that she knew of responsibilities other than those which she considered to be her own, by virtue of her said office in said church, nor did she testify that she knew of any records kept by, or in the possession of, this respondent; that in fact, she stated at that time ". . . there are so many papers, I told you, I cannot just offhand simply say 'yes' when I am not sure of myself", as appears on Line 9, Page 8, of the within petition which is a specific, honest and forthright statement from any witness; that in addition thereto, it should be pointed out that the things and conditions true on August 2, 1943 as testified by said Dr. Richardson were true on said date, but it is also true that thereafter, said things and conditions might change, yet, there is no testimony of said Dr. Richardson or of this respondent that did alter said statements and testimony of said Dr. Richardson; that thereupon, the Court requested said Dr. Richardson to check her records although she had not all, asserting, "You were the keeper of the entire records", which was not even true on August 2, 1943 when said Dr. Richardson certified that she held a certain office and that she was "The Keeper of the Records of the Puritan Church", and she had further said, on December 4, 1944, "Well, there may be records I know nothing about" and on February 28, 1944, she had testified that she had never in her life had any records of the Puritan [fol. 170] Church in her possession; that, then and there, this respondent volunteered to correct the mistaken impression under which this Honorable Court was then and there laboring, and to do so, he voluntarily testified that the records of said Puritan Church had been in Canada for some time and that the said trustees, too, were in Canada; he further testified, even though the Court said, "Tell them to order them back here again", that that was an impossibility because the trustees would not order them back to the United States whereupon the Court said, "If these records are in Canada, order them back here, and if you or Mr. Benton have any access to take records or control over them, order them back here." That thereupon this respondent informed said Court that the Court had no jurisdiction over said trustees or over said records, because of the fact that both were and had been in Canada, before the commencement of this proceeding; and that the Court was attempting to force this respondent said Dr. Richard-

son and said Benton to perform that which was impossible for them to perform.

12. That on December 4, 1944, before the said Honorable Daniel P. Trude, judge, this respondent did interrupt the testimony of said Dr. Richardson and did volunteer a statement to the Honorable Court: that he further testified that the Puritan Church, cognizant of its duty, which was to support the institutions of government and the government itself, had decided to expose corruption whenever and wherever it was found, for the reason that unless this corruption was exposed and stopped, consequences of the most serious nature would befall the United [fol. 171] States, and the citizens thereof; that he further testified that on that date, being December 4, 1944, the records of said Puritan Church were in Canada as he pointed out in the words: "These records are today in Canada, (see second paragraph, page nine of petition) and the trustees have not been served in this lawsuit"; that he went on to state, as best he could, the legal and constitutional guarantees which prevented this Court from doing that which had been set up against and had long existed, as part of the Constitution, and which prohibited this Court from doing that which it had done, and which it was doing, namely, inquiring into a church legally organized and existing under the laws of the State of Illinois; that he further pointed out, that which is apparent to anyone who reads the records, namely, that the Court had permitted and was permitting the petitioner and/or his counsel not only to go on a "fishing expedition", which has never been permitted under the law, but had permitted this "fishing expedition" in the records of a legally organized church which has long been prohibited by the Constitution of the United States; that on cross-examination, the respondent stated to the Court that all of the records and minute books of the said Puritan Church were in Canada, and had been there since 1941; that the respondent further testified that some of the records occasionally traveled outside of the State of Illinois, always under the direction and control of the trustees of said church; that the respondent did not ever admit that he had anything to do with the movements of said records or the direction of the movements of said records because, in fact, he was [fol. 172] not supreme in the church but there were others

over and above him; that the respondent further testified that said church was actively engaged in a campaign to expose and impeach certain judges for malfeasance in office in this state upon whom certain evidence which this church possesses; that the respondent further testified that at that time, being December 4, 1944, there was not a single record in Illinois of the said church and he gave as a reason therefor that the church had decided that what with the illegal power exercised by and the past illegal accomplishments of the law firm of Kirkland, Fleming, Green, Martin & Ellis, who represent the petitioner herein, that it would be much safer for the church to have the records of said church moved outside of the State, and that said records, in the opinion of said trustees of said church, would be safe in the dominion of Canada; that the respondent further testified that certain judges had violated the Constitution and that in his opinion, for that crime, they should be hanged, which crime, history divulges, has been the proper and frequent penalty paid by traitors; that this respondent wishes to point out that then and there, being December 4, 1944, he was in a strange position, legally, for the reason that on August 21, 1944, the Honorable Cornelius J. Harrington had ruled, in a similar petition filed by the petitioner herein, that this respondent need not answer any questions with regard to the said Puritan Church and the Brotherhood of the Ancient Order of St. John, nor to produce any records or papers of either of said organizations, yet after the said ruling of the said Judge Harrington, and when this matter was later heard by the Honor-[fol. 173] able Daniel P. Trude, the said petitioner and his counsel had presented a petition similar to that refused by said Judge Harrington and had obtained the permission of said Judge Trude to engage in the "fishing expedition" in which they were now engaged; that not only was the conduct of said counsel questionable and perhaps reprehensible, but in addition to that, this respondent was unable to determine legally whether he must obey by the said order of said Judge Harrington, or whether he must obey the later order of the said Judge Trude; that at the time of the drafting of this answer herein, this respondent is unable to quote the exact wording of either the ruling of said Judge Harrington, or the order of said Judge Trude, for the reason that the records of the within proceeding, he

had discovered, are now impounded and are therefore unavailable to him at this time; that this respondent further testified that in a political campaign for any office, the record of all candidates are properly before the public and that, as a citizen, this respondent maintained that it was his right to run for any office that he chose and in the campaign therefor, to acquaint the public with the truthful record of other candidates, sordid, or scandalous, as it might be, and that in the public interest, the law, of necessity, had to be so; and that respondent then and there, corrected the unwarranted, malicious and scurrilous remarks of said counsel who had then attacked a church, legally organized and existing under the laws of the State of Illinois, which is exactly that same law that protects any and all churches organized and existing in the State of Illinois, or seeking [fol. 174] protection thereunder.

13. That on January 2, 1945, the petitioner made another motion in the form of a more sweeping "fishing expedition" than any of those heretofore made, in which he asked this respondent about documents and facts with relation to the said Puritan Church and said Brotherhood of the Ancient Order of St. John, with particular reference to a certain non-existent committee which he called "the pretended 'Puritan Church Committee to aid in the driving of hoodlums, the assassins, the blackmailers, out of the control of the labor unions, out of the control of the legal profession, out of the control of journalism, and out of the control of politics' "; between the period commencing January 1, 1940 and January 2, 1945, in the face of the fact, then overlooked by said petitioner, his counsel and the said Judge Trude, that this proceeding had been commenced in the year 1943, and that on August 21, 1944, said Judge Harrington had ruled on a similar petition filed by the said petitioner and his identical counsel, to the effect that this respondent need not answer any questions, nor produce any papers relative to the said Puritan Church or the Brotherhood of the Ancient Order of St. John, by which was included the said Puritan Church Committee to aid in driving the hoodlums, etc.; that this respondent asserts, that said petitioner and/or his counsel attempted to give their reprehensible and improper conduct, in asking the order of one judge of the Circuit Court to be overruled by the order of another judge of the same said Circuit

Court, the barest semblance of legality and propriety by [fol. 175] proclaiming that they were proceeding under a certain rule: 17, Subparagraphs 8 and 9, of the Supreme Court of Illinois, but said petitioner and/or his counsel neglected to point out or give equal importance to the fact that said Judge Harrington had formerly denied their similar petition presented to achieve the same purpose; that this respondent then and there again pointed out in open court that the records sought were then in Canada and that he, personally, had nothing to do with their custody, control or movements and that he could not be held responsible or answerable as to their whereabouts at any given moment of time, and he again reminded this said Judge Trude, in open Court that said records were not relevant to the issue, as said Judge Harrington had ruled sometime ago; that, nevertheless, the respondent was ordered to make his answer thereto within five days, for he realized that irrespective of the said ruling of said Judge Harrington, and irrespective of what he considered to be his rights under the law and the Constitution, he was then and there confronted with the said order of said Judge Trude and realized that he must obey it insofar as he could; and he did comply with the said order as best he could by filing within the requisite five-day period; his affidavit and included therein as exhibits those documents which had come into his possession shortly before that time.

14. That on January 4, 1945, this respondent did file an affidavit with the Clerk of the said Circuit Court of Cook County in which he truthfully answered all of the questions [fol. 176] required of him and along with it, as a part thereof, he filed certain exhibits which had properly come into his hands shortly before, and were in his hands at the said time; that in said affidavit he did not, as this petitioner and/or his counsel charge, swear "inter alia, that in November, 1944, he had destroyed all originals, duplicate originals, and copies of all letters, telegrams, memoranda, etc., passing between Conrad Miner, Charles Norris and himself", nor did he in said affidavit swear, "that he had also destroyed in November, 1944, all minute books, written resolutions, by-laws, trust deeds, contracts, books of account, invoices, receipted bills, cancelled checks, check-stubs, bank statements and correspondence of and concern-

ing said so-called Puritan Church and said so-called Brotherhood of the Ancient Order of St. John", (see petition, Paragraph 14, page 15), except for the said four filed documents; and that he has denied and now denies that this said affidavit and the said documents were filed in any contempt of any court; that this respondent was required on the order of this Court to answer questions and make available "all originals, duplicate originals, and copies of all letters, telegrams, writings, memoranda, etc., passing between—and also all minute books, written resolutions, by-laws, trust deeds, contracts, books of account, invoices, receipted bills, cancelled checks, check-stubs, bank statements, showing or reflecting any dealings between" said entities, "during the period between January 1, 1940, up to and including the present time", and that among said persons and entities, were listed said Conrad Miner, said Charles Norris, said Homer Race, and "the pretended [fol. 177] 'Puritan Church Committee to aid in driving the hoodlums, the assassins, the blackmailers, out of the control of the labor unions, out of the control of the legal profession, out of the control of journalism, and out of the control of politics' "; that this respondent did do, insofar as was in his power, precisely what was required of him by the said order, as more fully appears from his answer heretofore filed; that he did not commit any of the acts nor make any of the statements set forth in Paragraph 14, page 15, of the petition herein filed, wherein one J. B. Martineau Jr., a partner of said firm of Kirkland, Fleming, Green, Martin & Ellis, attorneys for the petitioner in the within petition, has so knowingly and recklessly perjured himself and stated, under oath as being true in substance and in fact to the best of said Martineau's knowledge, information and belief, of said petition so sworn to by said Martineau; that, on the contrary, this respondent states the fact to be that on August 21, 1944, said Judge Harrington, a judge of this Circuit Court of Cook County and of equal jurisdiction with the said Judge Daniel P. Trude, ruled that neither this petitioner nor his counsel had any right to inquire into any affairs, matters, records or things, concerning said Puritan Church, said Brotherhood of the Ancient Order of St. John, and their committees and workings; that until the said ruling by the said Judge Harrington was properly reversed, there was no order or

motion pending in this matter, nor was there any motion or order affecting or regarding either this respondent, who was plaintiff therein, nor the said Puritan Church, nor the said Brotherhood of the Ancient Order of St. John, or [fol. 178] any of his or their books, records or correspondence; that on October 15, 1944, said Puritan Church leased from the University of Chicago additional premises in LaGrange, Illinois, and that on November 10, 1944, moved into the additional quarters; that for fifteen years past, this respondent has had no office or secretary; and all of his personal effects were in an apartment in which he lived at 4534 South Greenwood Avenue in the city of Chicago; that in the month of October, 1944, the trustees of the said Puritan Church concluded an agreement with this respondent whereby it would furnish him with a secretary and office space in and at said same place where said church was located at LaGrange, Illinois, in exchange for this respondent's devoting his entire time to the affairs of the said church and that this respondent accepted said agreement; that at said time, an express company undertook to move the personal effects of this respondent to said place in LaGrange and to charge him $18.00 apiece for each of three loads of his personal and private files; that this respondent thereupon directed said express company to move only one load at a price of $18.00 and he then and there, without knowledge of the contents and without any examination and without any sorting, destroyed the letters from his wife, his children, his personal friends and letters, without examination, from the said Messrs. Miner, Norris and Race, which had accumulated during a period of time, and which were all of a personal and private nature, having nothing whatsoever to do with, or "showing or reflecting any dealings between" as the motion required, this respondent and said Messrs. Miner, Norris and [fol. 179] Race; and that in so doing, this respondent did not violate the said motion to produce for said motion required him to produce material "showing or reflecting any dealings between" this respondent and said three individuals; that therefore, this respondent reiterates that he so complied explicity with the directions of said motion to produce for the reason that he has a knowledge of the contents of said letters and that none of them would reveal anything which said motion sought to reveal, and for the

further reason that the said petitioner and/or his counsel has and/or have no knowledge whatsoever of any of the contents of the said letters, and for the further reason that at the time of the said abandonment and destruction of his said personal, private files, there was no motion nor matter pending, involving said Puritan Church, said Brotherhood of the Ancient Order of St. John; and that said Judge Trude did not hear any of this instant matter until November 18, 1944 which date was after the said moving of the said personal effects of this respondent from Chicago to LaGrange; and that just prior to the time when he filed his said affidavit in response to the order of this Court, there came to this respondent's hands, the four copies of the said documents which, in accordance with the said order of said Court, he then and there filed, they being all that he then and there had in his possession; that this respondent denies that he, on November, 1944, destroyed any of the books, papers and documents as alleged by petitioner of the said Puritan Church or of the Brotherhood of the Ancient Order of St. John, and in his affidavit, he stated "all others were destroyed when this affiant moved [fol. 180] his office last November", for at that time, the trustees of the Puritan Church came to this city, and after examining, by themselves, without communicating with this respondent as to his opinion or wishes, destroyed all books, papers, records and documents which they deemed unnecessary to be installed in the said church at LaGrange, Illinois; and that they, the said trustees, without the help of this respondent, turned over all of said documents, papers and correspondence which they wished to discard to the janitor of said premises, there, and he then and there destroyed them; that thereafter, these trustees departed; that, thereafter, this respondent swore truthfully and correctly when he said that certain of said documents and papers were destroyed, but he has never admitted and does not now admit that he has ever destroyed or had anything to do with the said destruction of any of the papers or documents belonging to said church or to said brotherhood.

15. That this respondent, contrary to the allegations of paragraph 15 of said Petition, denies that he has ever stated, under oath, that either the Puritan Church or the Brotherhood of the Ancient Order of St. John, have made

plans to hang or murder anyone, and this respondent further denies that he has ever identified anything or stated or spoken that he has recklessly threatened to commit any crime, let alone, any murder; that this respondent denies that the petitioner had any basis on which to proceed when it "alleged" by and on behalf of this defendant in the divers petitions (filed to procure subpoenas), that said [fol. 181] so-called 'Puritan Church' was either in conspiracy with said Parker to commit extortion by threatening to commit said above-mentioned murder, or else was merely a sham devised by said Parker in an attempt to surround his attempted extortion and blackmail with an odor of sanctity"; but, on the contrary, he stated he has repeatedly maintained that all violators of the Constitution of the United States deserve the fate of hanging because of what their destruction of the Constitution means and will mean to the other citizens; that all law is down and that instead of government there is chaos; and that whatever he has been charged with having said or written, contrary to this, is an utter distortion of his meaning, purpose and intent; that therefore, said petitioner had no basis, in fact or law, for making the false statement charging this respondent or any person or entity associated with him, with threatening to commit any crime or with being in a conspiracy to commit extortion or to do anything other than the law permits; and that a conspiracy is yet to be shown, in addition to a showing of an attempt to commit extortion; that the only basis upon which such a statement had been subscribed to or alleged by this petitioner, existed in the minds of said petitioner and/or his counsel, and that by reason thereof they, if such petition was sworn to, said petitioner and his counsel or whoever swore thereto, should be held for perjury, for this respondent again points out that no one is permitted such reckless liberties with the orderly processes of the law as the petitioner and his counsel without suffering the penalty of perjury and contempt for the processes [fol. 182] of the law; that when this respondent stated on numerous occasions that he did not know the identity or whereabouts of the persons who composed either the Puritan Church or the said Brotherhood of the Ancient Order of St. John, he spoke the truth and he also spoke the truth when he stated that he did not know the whereabouts or

residence of Messrs. Miner, Norris and Race, save that they were in Montreal, Canada, and that the records of the said church were located on Red Path Road in said city, as appears on page 10 of the within petition; that this respondent points out that improperly, illegally and unconstitutionally this petitioner and his counsel have for a long time, attempted to inquire into the organization and workings of a legally organized existing church; that there is no proper precedent in law for such a maneuver as they have here, and for a long time prior hereto, been engaged upon, in pursuing this said maneuver, for they are running counter to the established law and the Constitution which has always protected any and all churches from said improper practices; that it has always been considered the concern of a church, alone, as to how it is organized, how it functions, what the relations between its members and officials are, and how the church operates, conducts its affairs, all to the exclusion of any outsiders; that in pursuing that course which he has now embarked upon, this petitioner and/or his counsel is and/or are attempting to create a dangerous precedent which can be used, if they be successful, against any and all other existing churches; that therefore, it is improper and wrong to hold this respondent responsible, accountable or attempt to gain from him information which he says he does not have, [fol. 183] as to the whereabouts of the said trustees of the said Puritan Church and of the said Brotherhood of the Ancient Order of St. John, and it is equally improper to charge said trustees, in any matter in which they are not a party or properly a party, and with which they have no connection, with being engaged in a conspiracy with this respondent to commit extortion or murder or being engaged in a sham of any kind, nature and description; that this respondent did not swear that he destroyed any correspondence between said Messrs. Miner, Norris and Race which, in the words of the said original motion read, or tending to show or, "showing or reflecting any dealings between", but, on the contrary, states that said correspondence was that accumulated over a period of years, was personal to himself, had nothing to do with any of the matters either properly or improperly before this Court, that they did not concern said Puritan Church, said Brotherhood of the Ancient Order of St. John, or any other

matters possibly within the pervue of this proceeding; that he had not examined said correspondence for upwards of six months and at that time, he destroyed said correspondence, there was no order pending and no reason why said correspondence should not be destroyed and that he destroyed said correspondence under the circumstances and for the reasons hereinabove given; he denies that if said correspondence had been produced by this respondent, that it would have been possible for this petitioner to have discovered anything therefrom regarding either the present whereabouts of the said Messrs. Miner, Harris and Race, or that their testimony could have been procured, or that [fol. 184] it would have in any way assisted the petitioner and/or his counsel in his and/or their supposition regarding the attempted extortion, blackmail, threats of hanging, murdering, or doing any of the other acts which said petitioner has imagined and now complains of, or that said Messrs. Miner, Norris and Race or said church or said brotherhood were, as is recklessly set forth in said petition "merely shams devised by Parker for the purpose of attempting to surround his attempted blackmail and extortion with an aura of sanctity"; that therefore, it does not appear and cannot appear to any reasonable soul, that by destroying said immaterial, personal and private correspondence, having nothing possibly to do with any of the matters in this proceeding, or mentioned in this proceeding, that this respondent can honestly, decently or properly be accused of having "knowingly destroyed material evidence in this cause."

16. That this respondent is well aware of the fact that on January 4, 1945 he had sworn "this affiant never heard of, nor has he ever had any connection with such an organization", which he made in answer to the portion numbered (23) of said motion which recited: "The pretended 'Puritan Church Committee to aid in driving the hoodlums, the assassins, the blackmailers, out of the control of labor unions, out of the control of the legal profession, out of the control of journalism and out of the control of politics' ", for in truth and in fact, there never has been such a committee; that this respondent was careful to answer the question categorically and truthfully, for he knew from long experience with the activities of the Chicago Tribune, whose counsel are the counsel for the petitioner

[fol. 185] herein, that had he answered that question in the affirmative, there was the strongest possibility that an article would appear in said paper, pilloring him and ridiculing him as having admitted that he belonged to a pretended committee of said church, and the files of the said newspaper furnish ample evidence of their treatment of this respondent, in the columns of said newspaper, without even such a basis as might thereby be furnished, had he answered other than he did; moreover, this respondent has repeatedly, under oath, and on his own initiative (Exhibit "A") not only maintained that he was chairman of a committee known as "The Puritan Committee to aid in driving the hoodlums, the assassins, the blackmailers, out of the control of labor unions, out of the control of the legal profession, out of the control of journalism and out of the control of politics", but in addition thereto, as he well recollects, he has furnished the attorneys for this petitioner with a statement that he was a member of said committee which exists in fact and has existed for some time as appears in the statement on page 15 of said petition; that therefore, this respondent could not properly be the member of any pretended committee, for none such ever existed, nor could he have had any dealings with a pretended committee, and that when he said he had not heard of any pretended committee, he was speaking the truth; it would have been improper, wrong and untrue of respondent to have admitted that he knew of any pretended committee as is described in said (23) of said motion heretofore filed by said petitioner and his counsel; and that this respondent denies that either he, or the said [fol. 186] Puritan Church or the said Brotherhood of the Ancient Order of St. John, or anyone that he knows or he has ever dealt with, have threatened to hang anyone, but he has said that the treatment accorded those who violate the Constitution should be, if they be found guilty of having violated the Constitution, is that they should be killed, for that is the fate which history has frequently dealt out to traitors of their country.

17. And this respondent specifically, in addition to all that appears herein, disavows any intention or intent of committing any acts or so conducting himself, that may or might be held or determined to be contempt of this Honorable Court.

18. That in Article VI of the Constitution of the United States appears a strict injunction that "this Constitution . . . of the United States . . . shall be the supreme law of the land and the judges in every state shall be bound thereby"; that in each, every and all of the said proceedings here mentioned and described, which this respondent has hereinabove set forth more fully, he has been deprived of his property without due process of law; and that he has in certain of said proceedings been deprived of his liberty without due process of law, all of which are in direct contravention, and contrary to, the provisions of the Fifth Amendment to the Constitution; that in certain of said proceedings hereinabove more fully set forth, the respondent has been deprived of the free exercise of religion, the freedom of speech and of the right to petition his government for a redress of said certain grievances in con- [fol. 187] travention of, and contrary to, the provisions of the First Amendment to the Constitution; that in certain of said proceedings hereinabove more fully set forth, this respondent has been deprived of the privileges and immunities properly guaranteed to him as a citizen of the United States, and he has been deprived of his liberty and property without due process of law, and he has been denied the equal protection of the laws, all of which are in contravention of, and contrary to, the provisions of the Fourteenth Amendment of the Constitution.

And therefore, respondent asserts:

First: From the above and foregoing, set out with reasonable sufficiency, it is patent to any reasonable soul that this respondent cannot be reasonably punished for contempt of court for "obstructing justice" by destroying the above-mentioned records of said "so-called Puritan Church" and said "so-called Brotherhood of the Ancient Order of St. John," and said correspondence of said Parker, Miner, Norris and Race while the same were being sought as evidence material to the merits of the matter in question in this cause"; nor did he ever intend any, for many months ago, to-wit: before this contempt arose, Judge Cornelius J. Harrington of this Court had, on the 24th day of August, 1944, ruled that the petitioner herein and his attorneys had no right to go on a "fishing expedition" into either said Puritan Church, or said Brotherhood of the Ancient Order of

St. John, or their records; for, moreover, in the light of this ruling, by a Judge of this said Court, of equal jurisdiction, [fol. 188] on the presentation of this identical question, and a ruling denying said power to the said petitioner, despite the fact that the petitioner states that "the same were being sought as evidence material to the matter in question in this cause", in accordance of said ruling of said Judge Harrington at the time said destruction took place, the evidence, by said Judge Harrington's ruling was not neither material to the matter in question here, nor did the said petitioner have the right to continue to seek such evidence, inasmuch as said evidence earlier had been ruled to be immaterial to the merits in said question by said Judge Harrington; for the further reason that this respondent has not admitted destroying any records of the said Puritan Church or of the said Brotherhood of the Ancient Order of St. John, for this respondent has never admitted destroying any of said records of said Puritan Church or of said Brotherhood of the Ancient Order of St. John; for the further reason that this respondent abandoned certain correspondence not "showing or reflecting any dealings" between himself and said Messrs. Miner, Norris and Race, which had accumulated over a long number of years, was of an extremely personal nature, had nothing to do with either said Puritan Church or said Brotherhood of the Ancient Order of St. John, and had not been viewed, examined or handled by this respondent for upwards of six months before the present time, when naught concerning them was pending; and for the further reason, that this respondent, having read said correspondence when it was received and occasionaly since, up to the said six months ago, is in a far better position to state with knowledge, and [fol. 189] does state, that said correspondence never did contain anything whatsoever material to the merits of this matter, even if it were to be produced and examined by the petitioner, whereas the petitioner never having seen any of said correspondence and knowing only of its existence by the statements of said respondent, is not in any position to either determine its existence or its materiality to the said cause.

Second: From the above and foregoing set out with reasonable sufficiency, it is again patent to any reasonable soul that this respondent cannot be reasonably punished for

contempt of court "for obstructing justice by committing perjury, by knowingly falsely swearing in open court on December 4, 1944 and again on January 2, 1945 that all of the said records (of said Puritan Church and of said Brotherhood of the Ancient Order of St. John) were in Canada, "nor did he ever intend any, for the reason that on the said dates the records of the said two entities were in Canada and nothing has been adduced save the unfounded suspicion of this petitioner and his counsel that they were anywhere else on those two dates; that it is highly improper either for this Court to permit inquiry into either said church of said brotherhood and that it is highly improper to hold this respondent accountable for the conduct of either said church or said brotherhood, when he has only an official connection with both, but does not have a control of either of said entities as he has been repeatedly showing in this proceeding; that in addition thereto, it is highly improper and wrong for this Court or for the [fol. 190] petitioner or his counsel to attempt to control the activities of persons and entities outside of this proceeding and this jurisdiction through any control that might be exercised over the person of this respondent; that this respondent has never committed perjury in this proceeding and that if that is the basis upon which a charge of contempt is hoped to be based in this proceeding, then there is no basis whatsoever on which to support such a charge, even if so determined by this Court.

Third: From the above and foregoing, set out with reasonable sufficiency, it is equally patent to any reasonable soul that this respondent cannot be reasonably punished for contempt of court for "obstructing justice, by committing perjury by knowingly falsely swearing in his affidavit of January 4, 1945 that he had never heard of and never had any connection with the 'pretended' or 'so-called Puritan Church Committee to Aid in Driving the Hoodlums, the Assassins, the Blackmailers, out of the Control of the Labor Unions, out of the Control of the Legal Profession, out of the Capitalized Control of Journalism, out of the Control of Politics—Conrad Miner, Charles Norris, Harrison Parker, Chairman' ", nor did he ever intend any, for the reason that there is not, nor has there ever been, any entity or organization, in fact, that was named, nor has there ever been any entity or organization that

could be described in fact, as the "pretended Puritan Church Committee to Aid, etc."; that this respondent swore truly when he said in his affidavit of January 4, 1945 that "this affiant never heard of, nor has he ever had any connection with such an organization", for the very good reason that there never has been either a "so-called Puritan [fol. 191] Church Committee to Aid, etc.", nor has there ever been a "pretended Puritan Church Committee to Aid, etc."; and for the reason of the non-existence of either of said entities or organizations, this respondent has denied that he has ever heard of them, nor had any connection with them; yet, on the contrary, in fact and in law, and for a long period of time, this respondent has admitted, during the taking of depositions in this matter on, to-wit: January 19, 1944, and thereafter, that he has been for a long time and still is, the chairman of an entity that exists in fact, which is known, and has only been known, as is set forth on Page 18, Line 11, of the petitioner's petition for rule to show cause as "Puritan Church Committee to Aid in Driving the Hoodlums, the Assassins, the Blackmailers, out of the Control of the Labor Unions, out of the Control of the Legal Profession, out of the Capitalized Control of Journalism, out of the Control of Polities"; and that he has been a member of this committee ever since its inception and is still chairman, as he has constantly insisted by this respondent, both during the taking of depositions and the hearings of this matter before the Court.

Wherefore, Respondent Prays:

One: That having fully, fairly and truly answered the rule, heretofore entered, to show cause why he should not be punished for contempt of this Honorable Court, he, the said Harrison Parker, respondent, be found and determined, by this Honorable Court, to have fully, fairly and truly answered the said petition, which he has been required [fol. 192] to answer, under oath, and hereby does; and that this Honorable Court find and determine that he, said Harrison Parker, be found and determined, to have fully satisfied said rule to show cause, heretofore entered against him, and that said rule be held and determined to be fully discharged, and that he, said Harrison Parker, be purged and freed of any contempt of this Honorable Court; and that he be forthwith discharged;

Two: That this Honorable Court, upon its own motion, examine into the conduct, herein set forth of said petitioner, Jacob Shamberg, and of his said counsel, Kirkland, Fleming, Green, Martin & Ellis, attorneys, and particularly said J. B. Martineau, Jr., for any improper conduct of which they are or any of them may be found guilty, particularly for their presuming to contrive to have one judge of this Honorable Court overrule the rulings of another judge of the Honorable Court, against the dignity of this Court, and for committing perjury by swearing, knowingly and falsely to certain petitions and motions filed herein by them or either of them; and in the event that they or any of them be found guilty, that they be punished accordingly, forthwith.

Harrison Parker, *Plaintiff.*
(*Respondent herein.*)

[fol. 193] *Duly sworn to by Harrison Parker jurat omitted in printing.*

Exhibit "A" to Said Last Mentioned Answer.

The Puritan Church—The Church of America.

The Puritan Church Committee, to aid in driving the hoodlums, the assassins, and the blackmailers out of the control of labor unions, out of the control of the legal profession, out of the control of journalism and out of the control of politics.

Conrad Miner,
Charles Norris,
Harrison Parker,
Chairman.

[fols. 194-195] In Supreme Court of Illinois

No. 29605

People State of Illinois, Defendant in Error,

vs.

Harrison Parker, Plaintiff in Error

Error to Appellate Court, First District

Minute Entry of Argument and Submission

Now on this day come the parties hereto and this being one of the days set apart for the call of the docket under

the rules of this Court, and it appearing to the Court that plaintiff in error hath filed herein a duly certified transcript of the record and proceedings of the Court below, together with printed abstracts thereof, and briefs and arguments of counsel in support of the errors assigned herein, and entered motion to reverse the judgment and remand said cause and for costs, and the said defendant in error having entered motion to affirm said judgment and for costs and procedendo, and said motions being taken under advisement for final hearing, and the Clerk of this Court reporting said cause is now ready to be taken, and said cause having been argued orally by Arthur Frankel for plaintiff in error and by George B. Duggan for defendant in error is here submitted for the consideration and judgment of the Court:

Therefore it is ordered by the Court that this cause be and the same is hereby taken under advisement.

[fol. 196] IN SUPREME COURT OF ILLINOIS

The People of the State of Illinois, Defendant in Error, v Harrison Parker, Plaintiff in Error.

Opinion filed March 19, 1947.

PER CURIAM: By this writ of error plaintiff in error seeks the reversal of a judgment of the Appellate Court for the First District, affirming a judgment of the circuit court of Cook county, finding him guilty of a direct contempt of court and sentencing him to the county jail for ninety days. A second judgment of conviction for a later contempt in the same court was reversed by the Appellate Court. No review has been sought of the reversed judgment.

Plaintiff in error, Harrison Parker, was the plaintiff in a slander suit, pending for trial in the circuit court of Cook county, against one Jacob Shamberg. During the preliminary stages of the proceeding, Shamberg filed a verified motion for discovery of documents, asking for a rule against plaintiff in error requiring him to show cause why he should not produce for inspection, and to be copied and photographed, certain documents listed in the motion.

The motion also requested that plaintiff in error be required to state by affidavit whether any of the specified documents were then or had been in his possession or power, and if not then in his possession or power, when he parted with them, and what became of them. The motion was apparently prepared and presented under the authority of paragraph (8) and (9) of Rule 17 of this court. (Ill. Rev. Stat. 1945, chap. 110, par. 259.17, subpars. (8), (9).) An order was accordingly entered by the court requiring plaintiff in error to produce the documents requested in the motion, and to make the required affidavit. On January 4, 1945, and within the time fixed by the order, plaintiff in error filed an affidavit with the clerk of the circuit court to which he attached as exhibits, five documents containing impertinent, insulting, malicious and scandalous charges against various judges of the circuit court of Cook county, the Appellate Court for the First District, and Justices of this court, as well as a number of other individuals prominent in public and private life. All of the courts of Illinois, including the court in which plaintiff in error was then a litigant, were charged with being corrupt and not open to the citizens of Illinois because of the corruption of the judges. Suggestion was also made that certain of the judges should be taken out [fol. 197] and summarily shot or hanged. These exhibits purported to be records, letters and other papers belonging to The Putitan Church, with which plaintiff in error appears to have been identified as an officer, and each of them bore his signature in some official capacity. It would serve no useful purpose to further detail here the contents of these exhibits since they are set out at length in the Appellate Court opinion. (*People* v. *Parker*, 328 Ill. App. 46.) That they contained impertinent, insulting, scandalous and contemptuous language reflecting on the integrity of the court cannot be denied.

Shamberg thereupon filed a motion directing the court's attention to the contents of the documents filed by plaintiff in error, and suggested that he be punished for contempt of court. Without permission of the court, plaintiff in error, on January 15, 1945, filed a long, verified answer to this motion in which he attempted to purge himself by asserting that the contents of the various documents were true. To this answer he appended his affidavit of January

4, 1945, together with the five exhibits attached to it. Thus, again, he presented to the court the same impertinent, insulting and scandalous matters contained in his first affidavit. After a hearing in open court, an amended order was entered on January 23, 1945, finding that the filing of the affidavit with its exhibits on January 4, 1945, and the filing of the answer on January 15, 1945, with its contents, constituted an obstruction of justice and abuse of the processes of the court; that it tended to lessen the dignity and authority of the court, and, by reason of such conduct, plaintiff in error was guilty of direct contempt of court. The affidavit, answer and exhibits were incorporated in the amended order by reference to the instruments as filed by plaintiff in error. The sentence to imprisonment in the county jail followed.

Plaintiff in error first contends that the documents in question were material to the issues in the slander suit against Shamberg, and the filing of them under the compulsion of an order of court could not be a contempt of court. By this argument plaintiff in error misconceives both the purpose and the extent of the court order. He had only to produce the documents for inspection and to be copied or photographed by the adverse party, under the direction of the court, and he would have fully complied with the order of court, as well as with the rule under which it was issued. Instead of complying with the order, [fol. 198] and for reasons best known to himself, he chose to file them with the clerk of the court, thus spreading the contents of the documents on the records of the court. Plaintiff in error's suggestion that the documents were material to the main suit becomes an empty argument when it is considered that these instruments had never previously been presented to the court, and the court, therefore, had no knowledge of their contents. The materiality of the documents had never been passed on by the court.

The gist of the many wild, shocking, insulting and scandalous charges contained in the exhibits to the affidavit and in the answer filed by plaintiff in error is that all of the courts in Illinois, including the court in which his suit was then pending, are corrupt, and that the courts are not open to the citizens of Illinois because of the corruption of the judges. Contempt may be committed by incorporating impertinent, scandalous, insulting or contemptuous

language reflecting on the integrity of the court in pleadings, motions and notice of motions. (*People* v. *Sherwin*, 334 Ill. 609.) The filing and presenting of the documentary exhibits in the circuit court constituted a direct contempt of that court.

The amended order of court, finding plaintiff in error guilty and sentencing him to the county jail for ninety days, recited the filing of the affidavit and exhibits on January 4, 1945, and the filing of the answer on January 15, 1945, as acts for which plaintiff in error was adjudged to be in contempt of court. It is urged that the sentence is a single one, while the judgment recites two separate and distinct offenses, and, for that reason, the sentence is erroneous and should be set aside. There is no merit in this contention. This is not in the nature of a criminal proceeding, and the rules regarding the trial of crimes by information or indictment have no application to proceedings for contempt. (*People ex rel. Rusch* v. *Kotwas*, 363 Ill. 336; *People ex rel. Martin* v. *Panchiré*, 311 Ill. 622.) The authorities cited by plaintiff in error, in support of his contention, pertain to criminal cases and are not applicable here.

Certain constitutional questions are presented as grounds for reversal of the judgment. The record shows that plaintiff in error proceeded with this appeal from the amended order directly to the Appellate Court. Having first taken his case to that court, where errors were assigned of which the Appellate Court had jurisdiction, he is deemed to have waived the constitutional questions and they cannot now be considered. *People* v. *Rosenthal*, 370 Ill. 244.

We are of the opinion that the judgment of the Appellate Court is correct, and it is affirmed.

Judgment affirmed.

[fols. 199-200] IN THE SUPREME COURT OF ILLINOIS

No. 29605

PEOPLE STATE OF ILLINOIS, Defendant in Error,

vs.

HARRISON PARKER, Plaintiff in Error

Error to Appellate Court, First District, 43C, 13381, 43372

JUDGMENT—March 19, 1947

And now, on this day, this cause having been argued by counsel, and the Court, having diligently examined and inspected as well the record and proceedings aforesaid, as matters and things therein assigned for error, and now, being sufficiently advised of and concerning the premises for that it appears to the Court now here, that neither in the record and proceedings aforesaid, nor in the rendition of the judgment aforesaid, is there anything erroneous, vicious or defective, and in that record there is no error.

Therefore, it is considered by the Court that the judgment of the Appellate Court, First District aforesaid, be affirmed in all things and stand in full force and effect, notwithstanding the said matter and things therein assigned for error. And it is further considered by the Court that the said defendant in error recover of and from the said plaintiff in error Costs by it in this behalf expended, to be taxed, and that it have execution therefor.

[fol. 201] PETITION FOR REHEARING COVERING 61 PAGES FILED APRIL 12, 1947.

Denied without more by order of May 19, 1947.

[fol. 202] IN SUPREME COURT OF ILLINOIS

ORDER DENYING REHEARING—May 19, 1947

And now on this day the Court having duly considered the petition for rehearing filed herein, and being now fully advised of and concerning the premises, doth overrule the prayer of the petition and denies a rehearing in this cause.

[fol. 203] Clerk's certificate omitted in printing.

[fol. 204] SUPREME COURT OF THE UNITED STATES

ORDER ALLOWING CERTIORARI—Filed January 5, 1948

The petition herein for a writ of certiorari to the Supreme Court of the State of Illinois is granted, and the case is consolidated with No. 428 for argument.

And it is further ordered that the duly certified copy of the transcript of the proceedings below which accompanied the petition shall be treated as though filed in response to such writ.